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GE Power Systems

Katherine McKenzie Stern
Paralegal - Environment, Health & Safety

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Fax (518) 385-4074

February 4, 1998

Ms. Elizabeth Domagalski
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Mr. Tomas Torres
Remedial Project Manager
USEPA Region IX
75 Hawthorn Street
San Francisco, CA 94105

Re: General Electric Power Systems Tucson, AZ Service Shop
Tucson International Airport Area Superfund Site, Tucson, AZ

Dear Ms. Domagalski and Mr. Torres:

Enclosed please find two copies of our response to EPA's Supplement Request for Information pursuant to the above-captioned facility.

I have also enclosed the following additional documents for your review:

1) A Tucson shop profile created in 1994, with attached waste water and air permit applications and information, added to the profile in 1996. I was unable to find any data suggesting usage of TCE by the shop in this documentation;
2) Tucson's RCRA Inspection Report dated 6/11/84 (w/cover letter). This report states the shop's hazardous waste usage in quantity and states the shop's disposal practice. Stoddard Solvent is described as "drummed and disposed of at a hazardous waste disposal site.";
3) A Request for Information from the EPA dated October 20, 1982 along with GE's response to that request dated November 18, 1982. Our response confirms the use of Stoddard Solvent however, there is no indication that TCE was ever used at the shop; and

4) A confirmatory letter with supporting data dated 2/23/99 compiled from a recent floor drain sampling event. Again, the sampling data confirms our position and the shop's position that TCE was not used at this facility.

Please do not hesitate to contact me if you have any questions concerning the enclosed. Thank you.

Very truly yours,

Katherine McKenzie

Enc.

US EPA Region IX

General Electric Power Systems Response to Supplemental Request for Information
Pursuant to the General Electric Tucson, Arizona Service Center located at 1401 E. Valencia Road Tucson, Arizona

These supplemental responses are provided on behalf of the General Electric Company and relate to a business operated by its Industrial and Power Systems Division in Tucson, Arizona from 1972 until the present time. This business is known as the Tucson Apparatus Service Shop.

The Tucson Service Shop , throughout its history, has been engaged in the business of repairing industrial and power equipment. The apparatus service shop is in operation.

GE objects that EPA's Supplemental request for additional detail is overly broad, burdensome, duplicative of information already in EPA's possession and not calculated to lead to relevant information. Nevertheless, GE has gone to considerable lengths to provide these supplemental responses to all of EPA's inquiries.

1. The full name, address, and telephone number, position or positions held by and tenure of the individual(s) answering any of these questions on our behalf are:

   Christopher Allen
   Manager - Global Services
   1 River Road, Bldg. 2 - 1
   Schenectady, NY 12345
   (518) 385-0623

   Bryce MacDonald
   Manager - Remedial Programs
   1 River Road, Bldg. 43 - 2
   Schenectady, NY 12345
   (518) 385-4980

   James A. Sevinsky
   Counsel - Environment, Health & Safety
   1 River Road, Bldg. 43 - 2
   Schenectady, NY 12345
   (518) 385-8080

   Katherine McKenzie
   Paralegal - Environment, Health & Safety
   1 River Road, Bldg. 43 -2
   Schenectady, NY 12345
   (518) 385-5105

   Carol Ryan
   1 River Road, Bldg. 2 - Basement
   Schenectady, NY 12345

(518) 385-0024

Christian Dahlberg
Financial Operations Leader
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William Lucas
Environment, Health & Safety
1401 E. Valencia Road
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Wayne Smith
GE Tucson Service Center
1401 E. Valencia Road
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(520) 889-3346

Warren Threlkeld
GE Tucson Service Center
1401 E. Valencia Road
Tucson, AZ
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William Ross
GE Tucson Service Center
1401 E. Valencia Road
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David Lowrey
GE Tucson Service Center
1401 E. Valencia Road
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(520) 889-3346

Jerry Carrillo
GE Tucson Service Center
1401 E. Valencia Road
Tucson, AZ
(520) 889-3346

The individuals listed below provided the additional information necessary in order to provide you with a more detailed explanation of shop operations and job descriptions as requested in Question 3(b):

Wayne Smith
Lead Man - Machinist
30 years of Service
Primary responsibilities are to direct other machinists and support sales personnel with customer issues and job quotes

Warren Threlkeld

Lead Man - Winder. Past positions include: Test & Inspect, winder, and machinist.
31 years of Service
Primary job responsibilities are to direct other winders.

John Harkins
Lead Man - Test & Inspect. Past positions held include steam dock helper and winder.
27 years of Service
Primary job responsibility is to direst other T&I employees.

2. As we discussed, General Electric Company is the sole owner of the Tucson Service Shop. The Service Shop has not changed ownership since its inception in 1972.

3. a. We have never kept track of the approximate volume of equipment repaired at this facility. It was not common business practice to do so. We have performed a diligent search of our files and do not have data to answer this question.

b. The repair process is described below and for further clarification of the operations. See Attached Flow Charts:

The three most common pieces of equipment repaired at the Tucson shop are ***Motors***, ***Crushers***, and ***Gear Boxes***. To follow are narrative descriptions of the repair process for these three types of equipment. The group also generated a process map for each piece. It is recommended that the process map be used to guide the reader through the narrative.

Motors:
When a motor is received at the shop, it is first disassembled and all parts are cleaned by the **Test & Inspect Employees**. The cleaning consists of steam cleaning and baking (to dry) the components. The waste generated from this process consists of the steam cleaning sludge. The stator and endbell remain with the **Test & Inspect** department and the armature is sent to the **winding area**. Both the stator and armature are tested to determine if a rewind is necessary.. If a rewind is required, the stator will be sent to the winding area. If a rewind is not required the stator and endbell components (rotor, shaft, endbell) go to the machine shop where they will be metal sprayed, machined (wastes consists of copper chips and mica) , balanced, and welded. Simultaneously, the armature is rewound, if necessary by the winding department. The armature is first stripped (wastes include copper, mica, fiberglass) and then burned out in the oven to remove varnish. The residual copper, mica, and glass are then stripped. The commutator is tested, if it is not functional, it is sent out to a vendor for repair. If it is functional, it is "cleaned". The cleaning of the commutator consists of deburring and polishing (machining) to remove metal components. There is no water or chemicals used here. The armature is then wound (installation of copper coils). Materials used in this process are copper coils, varnish and an epoxy / catalysts mixture which is applied with a paint brush. Wastes generated are the paint brush and residual epoxy. The next step for the armature is tig welding and banding. The armature bands are either epoxy filled glass bands or steel (waste generated include excess bands and approximately 1 acetone rag). The armature is then put into the vacuum pressure impregnator (vpi) to thoroughly coat the coils with varnish (702) (wastes include drippings which are captured in a pan and approximately 2 rags). The armature is then "overdipped" submerged into a varnish (712) (waste generated include drippings which are captured in a pan and approximately 2 rags). The armature is then sent to the machine shop where it is possibly re-banded (stringbands) (wastes consists of excess fiberglass strings and a residual of the pre-made epoxy mixture with tongue depressor for application) by the machinists. The armature is then painted (applied by spray) assembled and shipped.

Crushers:

The second most frequent type of equipment repaired at the Tucson shop are crushers. Crushers are used in the mining industry to break and crush rock and other materials. When a crusher is received, it is first cleaned by sandblasting. The sandblasting of crushers has been performed off site since approximately 1988. The crusher then undergoes a non destructive test (NDT). This is performed by a subcontractor, and a dry NDT powder is used. The crusher is then machined , welded, and grinded (wastes produced are steel chips, slag, and dust). The crusher is then re-machined (fittings) and tap holes are drilled (wastes generated include cutting oils and steel chips). The crusher is then deburred (machined), cleaned (using 1500 thinner or acetone; approximately 10 rags used), painted (spray applied), and shipped.

Gearboxes:
The third most common type of equipment repaired at the Tucson shop are gearboxes. The Mechanical employees are the only employees that perform repairs on gearboxes. When a gearbox is received, it is drained of oil. This usually takes place at the customer site; however, if oil is in the equipment when it arrives, it will be drained, containerized, and sampled. The gearbox is then disassembled, steam cleaned (waste generated is sludge), and inspected using dry NDT techniques. If necessary, components will be machined, welded, or metal sprayed (wastes consist of chips). The gearbox is then reassembled, painted (spray applied) and shipped.

c. The activities performed by a "Winder", a "Machinist, and a person in "Test and Inspect" are described in Job Description Forms provided by our Human Resource Department. (See Attached Forms) Furthermore, a description as to how each position plays a role in the repair process is described in more detail in response 3(b).

d. The processes are described in detail in response 3(b) and can be further confirmed using the MSDSs. It was not and is not common business practice to keep track of changes in chemical products over time. The most adequate representation of the products used can be found in the MSDSs previously provided to you.

e. The facility is cleaned and maintained by shop personnel. It has been the shop's common practice to sweep chips and other debris from the floor area and dispose of it in waste cans. The floor is washed when necessary by using soap and water with a push broom to scrub the designated area. The employees have stated that this has been the shop's practice for as long as anyone can recall.

f. To the best of our knowledge the shop did not keep track of the amount of waste generated and the disposition of each in the early years. The shop employees describe barreled waste being transported from the shop, and, drummed waste oil being purchased by haulers, however, no one could recall specific years or amounts of waste generated. Certainly, in more recent years waste generation and disposal is represented by waste manifests provided to you in the original response.

g. See attached map. This represents to the best of our recollection the facility as it appeared prior to the building addition. The wastes generated during each process are detailed above in answer 3(b).

4. During our discussion of February 19, 1999 we agreed that you have found adequate as-built drawings to answer this question.

5. Aside from the building expansion in the early 1970s, there was a cement pad put down for the hazardous waste storage area in 1985; and there was an erection of a pole barn used as a holding area for shipping new parts in the back of the property. There are no known available records pertaining to bills of lading, etc. A diligent search of all documents has not provided details of any sampling of soil prior to the Dames & Moore sampling event. The Dames & Moore soil report was prepared during the summer of 1998.

6. The individual employees, past and present, who exercised actual control or who held significant authority to control activities at the facility are:

   Mr. Dave Shannon, M.S.O. from 1992 - 1995
   Denise Gasbarri-Smith, Customer Service 1979 - 1994

   Center Mangers:

   William Lucas, Center Manager 1998 to date.

   Chris Coan, Center Manager 1997-1998

   Lorin Hewitt, Center Manager 1995-1997

   Tom Hawse, Center Manager 1987 -1994

   Cliff James, Center Manager 1983 - 1987

   Lorin Hewitt, Center Manager 1978 - 1983

   Larry Fuller, Center Manager 1976 - 1978

   James Lance, Center Manager 1969 - 1976

7. An additional list of both hourly and salaried employees has been generated for your use. (See Attached) This is the most comprehensive list we have been able to generate to date.

8. GE is self-insured.

13. The individuals who assisted in the preparation of your response to this information request are:

   James Sevinsky
   GE Main Plant
   1 River Road
   Schenectady, NY

   Bryce MacDonald
   GE Main Plant
   1 River Road
   Schenectady, NY

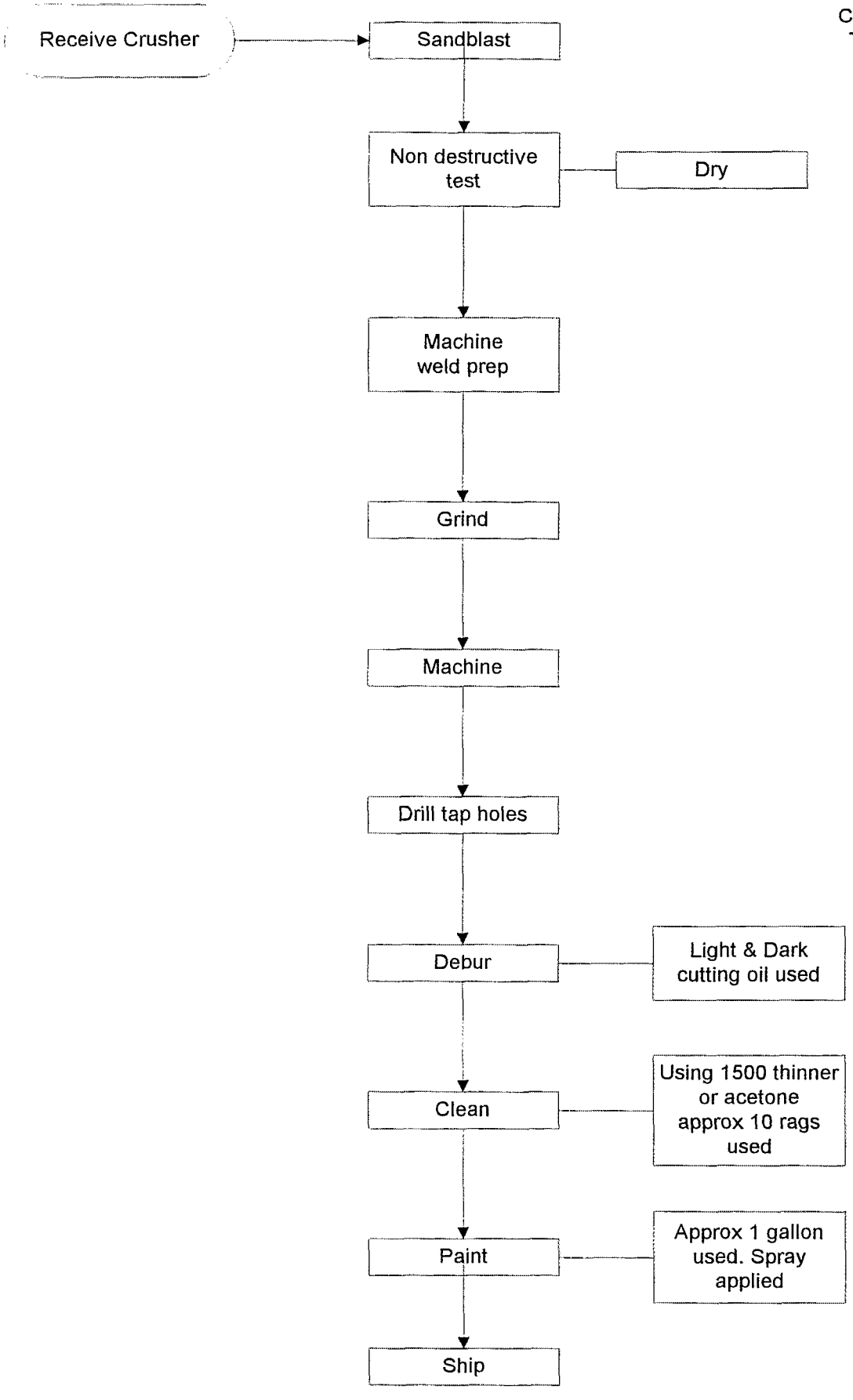
   Katherine McKenzie
   GE Main Plant
   1 River Road
   Schenectady, NY

8. General Electric is self-insured.

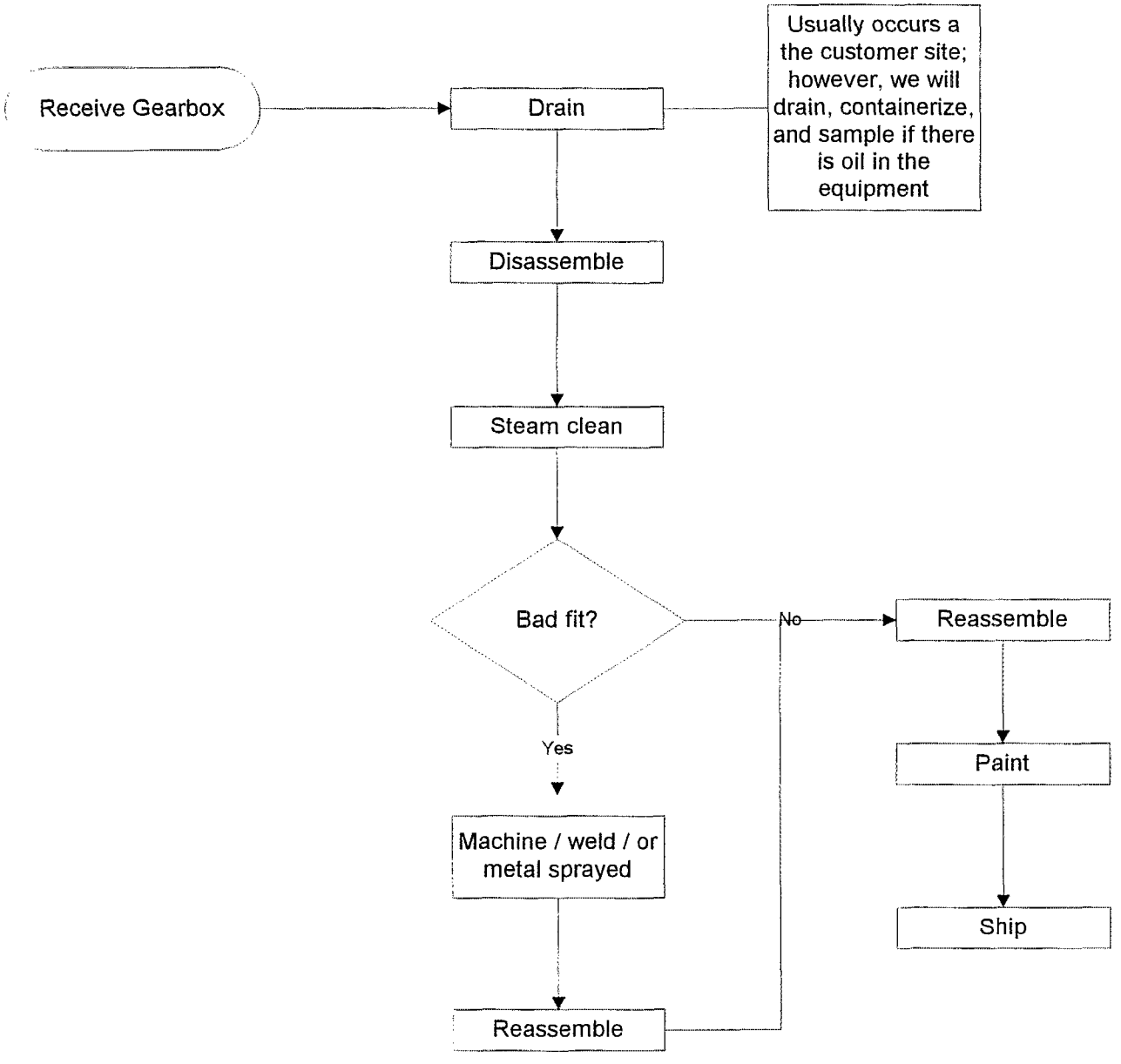
A diligent search for records pertaining to the information requested has been performed. Should General Electric find any additional information pertaining to this request we will supplement this response immediately.

DATED: February 23, 1999

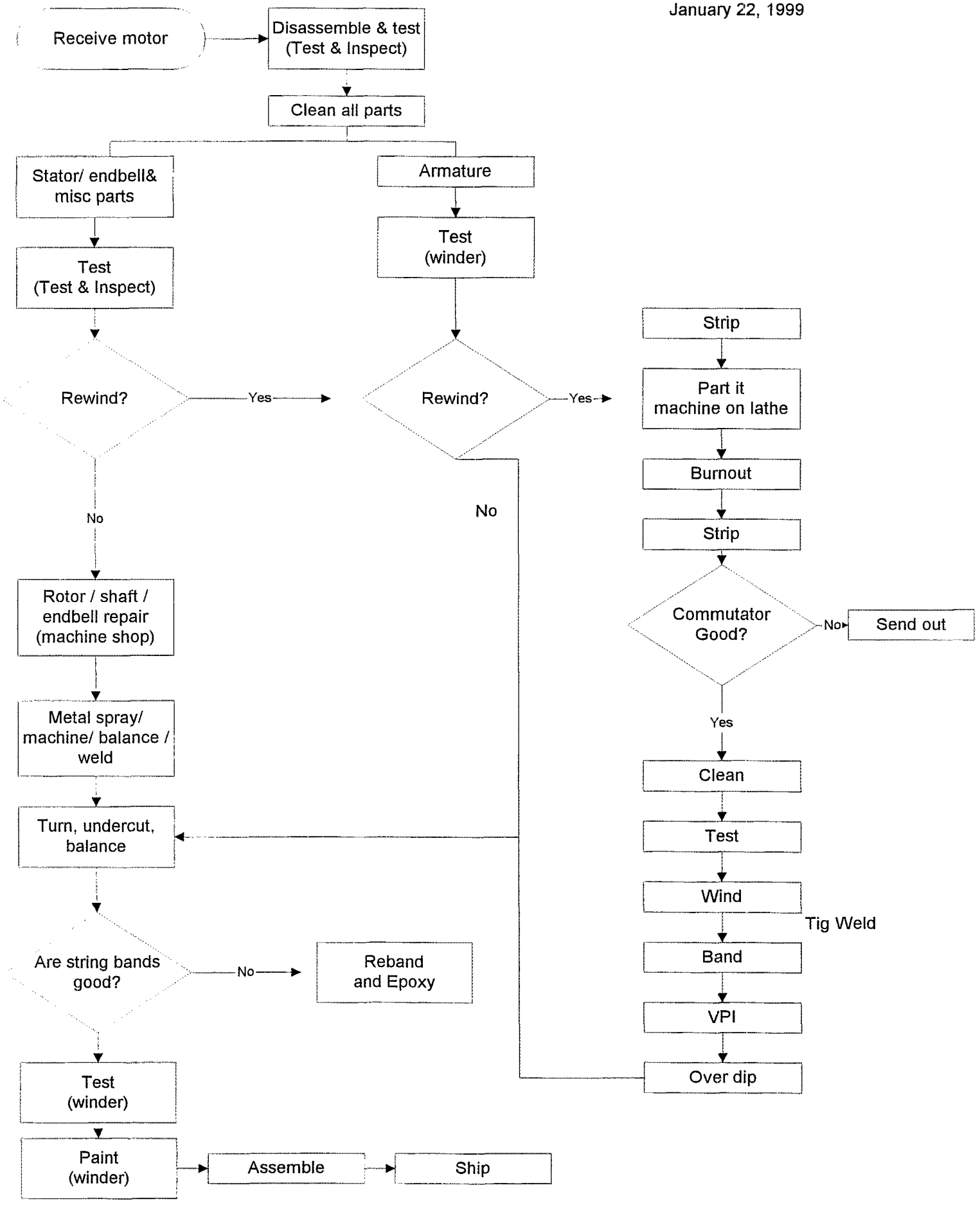
Crusher Repair Process
Tucson Service Shop
January 22, 1999



Gearbox Repair Process
Tucson Service Shop
January 22, 1999



Motor Repair Process
Tucson Service Shop
January 22, 1999



TRUCK DRIVER

Drives large and small trucks and is familiar with handling all types of electrical equipment. Makes out-of-town scheduled trips as well as local-area ones. Requests present and prospective customers of the Center for their repair work during regular scheduled trips. Assists in Center work when necessary. Performs related duties as assigned.

TRUCK DRIVER-TRACTOR TRAILER

Drives tractor-trailer type truck and is familiar with handling all types of equipment. Requires a knowledge of handling and securing loads as well as proper operation of the trucks. Makes out-of-town scheduled trips as well as local area ones. Requests present and prospective customers for their repair work while at the customer's plant. Assists in center work when necessary. Performs other duties as assigned.

WELDER - GROUP A

Performs all welding operations with broad knowledge and experience as applied to shielded metal arc, submerged arc, gas metal arc, flux cored metal arc, gas tungsten arc and other welding processes. Must be able to read and interpret layout and mechanical blueprints. Must have knowledge of base metals, filler metals and alloy selection. May use metallizing equipment. Operates press brake to accomplish general fabrication. Sets up work and selects appropriate equipment. Performs related duties as assigned. May direct and train welders as required.

WELDER - GROUP B

Performs miscellaneous operations involving less complicated shielded metal arc, submerged arc, gas metal arc, flux cored metal arc, gas tungsten arc and other welding processes. May perform less difficult work relating to blueprints, layouts, fabrication and press brake operation. Must have knowledge of base metals, filler metals and alloy selection. May use metallizing equipment. Performs related duties as assigned. May direct and train welders as required.

WELDER - GROUP C

Performs simple operations involving shielded metal arc, gas tungsten arc and other welding processes. Performs simple layout and fabrication operations. Makes simple repairs on related welding jobs. May assist and work under direction on more complicated and difficult jobs. Performs related duties as assigned.

WHEELMOTOR REPAIR

Perform operations required in the dismantling, inspection, repairing, rebuilding, reconnecting, reassembly, testing and reporting on all forms of motorized wheels. May assist LEAD REPAIR or others in problem diagnosis and repair of wheelmotors. All of the above-mentioned work may be performed both inside the center and at a customer location. Properly applies and uses common electrical testing equipment and procedures. Reads and works from schematics and drawings. Performs other duties as assigned and may direct, or aid in the training of, lesser qualified personnel.

JOB CLASSIFICATIONS AND DESCRIPTIONS - TUCSON SERVICE CENTER
(Continued)

WINDER - GROUP A

Performs complicated operations involving dismantling, rewinding, repairing, reassembling, testing, etc., on large or more complicated AC and DC equipment such as motors, generators, turbine-generator stators and fields, rotary converters, transformers, regulators, etc. May dismantle and make repairs to large commutators and collector rings. May band and install core insulation on all types of rotating equipment. Performs related duties as assigned. May direct others.

WINDER - GROUP B

Performs difficult operations such as rewinding, repairing, reassembling and testing medium-sized DC armatures, AC stators and rotors, etc. Performs related duties as assigned such as assisting on the larger or more complicated units. May dismantle and repair commutators and collector rings as well as to band rotating equipment. May direct others.

WINDER - GROUP C

Performs simple operations such as wind, repair, strip, connect, etc., on equipment such as random wound and single phase stators, small AC and DC armatures, rotors, etc. Performs related duties as assigned and assists in the more difficult operations.

****

JOB CLASSIFICATIONS AND DESCRIPTIONS

TUCSON SERVICE CENTER

It is understood that the job classifications and definitions referred to below are merely for the purpose of identification and general description and do not purport to be all-inclusive or exhaustive of the actual requirements of any job so classified or defined or express any limitations on how, when or where the job will be performed.

****

ELECTRICAL MECHANIC - GROUP A

Performs complicated operations including dismantle, adjust, repair, reassemble and connect as required on all types of AC and DC motors, generators, rotary converters, transformers, gear units, transportation equipment, etc. May test, report and perform miscellaneous related duties as assigned. May direct others.

ELECTRICAL MECHANIC - GROUP B

Performs difficult operations including dismantle, adjust, repair, reassemble and connect as required on the more common types of AC and DC motors, generators, converters, relays, rheostats, auto transformers, etc. May test, report and perform miscellaneous related duties as assigned. May direct others.

ELECTRICAL MECHANIC - GROUP C

Performs simple operations including dismantling and reassembling small equipment. May assist and work under direction on more complicated and difficult jobs. Performs related duties as assigned.

HELPER

Assists all classes of workers where required. Performs general work as directed. May be assigned as specialized helper to machinists, winders, etc.

INSPECTION AND TEST - GROUP A

Performs miscellaneous operations such as inspect, test, repair, investigate and report on various types of electrical equipment such as AC and DC motors, generators, transformers, rotary converters, control devices, etc. May dynamic balance and aid engineers at special tests, trial and acceptance runs, etc. Performs related duties as assigned. May direct others.

INSPECTION AND TEST - GROUP B

Inspects, tests, reports and makes minor repairs on electrical and mechanical equipment such as AC and DC motors and generators, transformers, regulators, rotary converters, etc. Performs other related duties as assigned. May direct others.

INSPECTION AND TEST - GROUP C

Inspects, tests and reports on the majority of general purpose AC and DC motors. Makes routine tests on small transformers and other simple devices. Performs related duties as assigned.

LEAD WHEELMOTOR REPAIR

Provide craft oriented leadership and technical direction across the full spectrum of wheelmotor repair work. Perform operations required in the dismantling, inspection, repairing, rebuilding, reconnecting, reassembly, testing and reporting on all forms of motorized wheels. All of the above-mentioned work may be performed both inside the center and at a customer location. Properly applies and uses common electrical testing equipment and procedures. Reads and works from schematics and drawings. Will direct and aid in the training of lesser qualified personnel.

MACHINIST - GROUP A

Performs miscellaneous operations involving broad machine shop experience. Operates all types of machine tools involving close tolerance work, intricate setups and development. Dismantles, assembles, diagnoses and corrects mechanical trouble on electrical and mechanical equipment such as turbines, motors, generators, transformers, etc. Machines or builds parts from samples or drawings. Performs related duties as assigned. May direct others.

MACHINIST - GROUP B

Operates all types of machine tools and performs the less complicated, less exacting and/or repetitive machine operations such as boring commutator segments, dynamic balancing, turn and undercut commutators and collector rings and operate metal spray equipment. May perform some of the less difficult work on jobs such as rebucketing medium and small turbine rotors. Performs related duties as assigned. May direct others.

MACHINIST - GROUP C

Performs simple operations on machine tools such as drill press, shaper, milling machine, lathe, etc., including operations such as rough turn shafts, turn and undercut small commutators, collector rings, bore bearings and make simple or repetitive parts from samples or drawings. Make simple repairs, performs related duties as assigned and assists on the more complicated operations.

MAINTENANCE - GROUP A

Performs complicated operations in connection with electrical and mechanical maintenance and related work where necessary. Performs welding, cutting, drilling and machine work as needed. Establishes and performs preventive maintenance procedures and routines. May do center construction work and performs related duties as assigned, including safety work.

MAINTENANCE - GROUP B

Performs difficult operations in electrical and mechanical repairs as necessary in maintaining the buildings and equipment. Performs welding, cutting, drilling and machine work as needed. Performs preventive maintenance procedures and routines that have been established. Performs related duties.

OHV REPAIR

Provide hands on repair work and craft oriented leadership and technical direction across the full spectrum of OHV electrical and mechanical drive systems. Perform operations required in problem diagnosis, dismantling, inspection, repair, rebuilding, reconditioning, reassembly, testing and reporting on all forms of OHV drive system components. May direct work of others. Routinely spends the majority of his/her time performing the above mentioned work at customer sites and may also be required to work in the center. Requests present and prospective customers of the center for other repair work. Will direct and aid in the training of lesser qualified personnel.

STOCKROOM/TOOLROOM KEEPER

Must be thoroughly familiar with stock and tools. Receives, stores and disburses stockroom material and tools. Responsible for stockroom and toolroom. Performs related duties as assigned.

TRANSFORMER REPAIR - GROUP A

Repairs, rebuilds, rewinds and tests equipment such as transformers, regulators, circuit breakers, reactors, etc. Performs related duties as assigned. May direct others.

TRANSFORMER REPAIR - GROUP B

Repairs, rebuilds, rewinds equipment such as large distribution transformers, small constant current transformers, etc. Helps others on larger and more complicated jobs and performs related duties as assigned. May direct others.

TRANSFORMER REPAIR - GROUP C

Performs miscellaneous operations in connection with the repair of distribution transformers, etc., such as dismantle and clean parts, stack iron, assemble coils and connect, assemble in tanks and connect, paint, etc. Helps others on larger and more complicated jobs. Performs other related duties as assigned.

TUCSON SERVICE CENTER
1974

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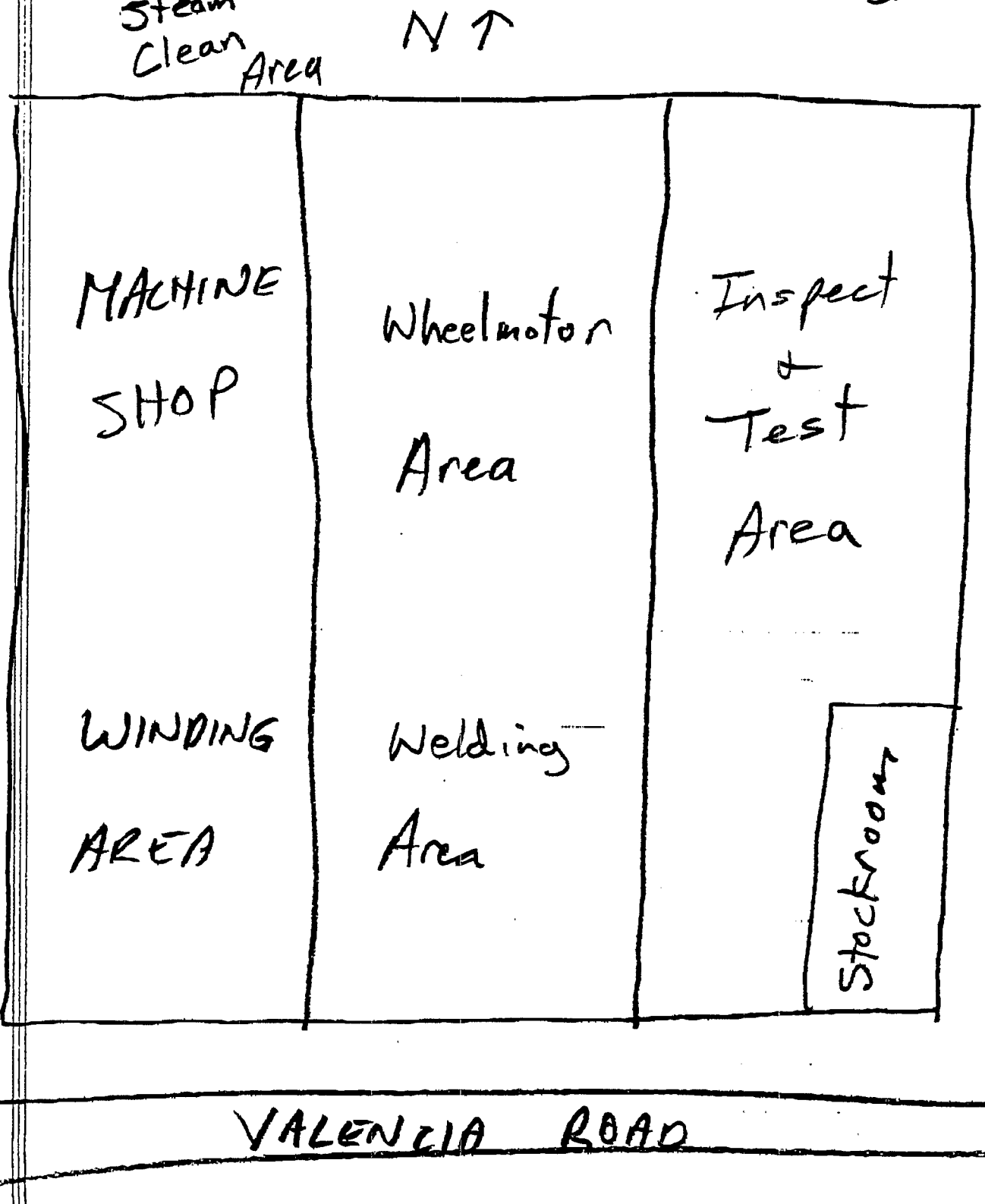

Former GE Tucson Service Center Employees

Name	SSN	Name	SSN	Name	SSN
HOURLY		SALARY		SALARY	
Jim Baldwin	489-20-7038	Fred Gintz	458-38-7933	Dale Campbell	537-44-1282
Roy Anderson	468-03-2613	Jack Armer	527-78-9443	Bill Carlton	527-32-1222
Dawn Bachman	504-82-6120	Gene Aros	526-78-3732	James Carpenter	526-58-0156
Art Beebowen	716-18-8375	Don Armour	527-96-1720	Alvin Carr	314-09-5238
John Campbell	493-22-3472	Frank Atkinson	075-32-3757	John Cheshier	527-94-0335
Dick Carrillo	526-64-2620	Rick Atteberry	526-19-2001	Michael Cheshier	527-94-0311
Tom Curtis	482-46-9863	Kenneth Austin	454-92-4887	Ed Clark	585-36-3929
Roger Cutchin	351-34-9307	Larry Baker	072-44-8032	Victor Clevidence	526-41-6210
Larry Daves	534-40-8533	Norman Barreras	526-48-0416	Dennis Cohn	527-72-7151
Mike Faith	551-50-7387	Ed Belcher	354-30-4786	Mike Cole	537-37-9934
Eva Lamborn	547-40-1569	John Beebower	526-74-8737	Richard Comeau	032-40-3877
Ruth Davis	286-50-9093	Fred Bloss	208-30-7246	Ed Comeau	020-24-3349
Judith Engel	096-22-0094	Johnny Boettcher	526-81-7838	Carlos Conner	457-90-3794
Maria Estrella	527-23-8043	Jack Booth	236-24-9958	Donald Cook	517-22-3409
Carl Furr	527-96-4210	Sergio Borquez	527-56-3024	Steve Cortez	527-61-1989
Don Houley	066-48-8532	Thomas Bitterlie	526-98-5492	Robert Coziahr	349-32-2322
Verlin Jenkins	279-34-5480	Harold Blair	405-50-1674	George Cranz	527-96-3757
Al Ferrell	236-36-7186	Bill Blankenship	585-03-2227	Marcos Crockwell	548-42-4230
Tom Jordan	409-60-2383	Danny Blanton	526-84-7417	Mike Davis	441-28-2988
Mary Kirkaldy	363-48-9765	Paul Bowden	526-11-1128	James Del Pino	454-74-9510
Jim Lafant	366-28-8105	John Bowers	526-13-0692	William Dion	526-88-4511
Bill Maxwell	527-38-5855	Judith Biwling	251-68-5189	David Doyle	281-56-5182
Jack Martyn	527-52-2838	Ray Bracamonte	527-30-7909	Johnnie Douglas	526-80-6505
Deborah Moore	526-88-1873	Robert Bracomonte	526-45-1780	Tom Dugan	526-27-0402
Bill Morgan	443-36-3244	Arthur Brady	101-14-4180	Carl Erickson	299-22-4767
Al Olivarz	464-68-1313	Melvin Brittain	574-16-9721	Dick Esposito	050-34-6354
Tom Rinaldo	357-20-1961	Michael Brock	324-38-2773	Donald Dunmire	347-44-9927
Ralph Ruggriro	526-70-0223	Jerry Brooles	526-40-1830	Jerome Dunn	343-30-9986
Harry Shipman	521-03-5183	Virgil Brown	280-30-6081	Kim Eastman	004-40-2944
Larry Larsen	526-70-4515	Jimmy Bryant	298-50-8567	Charles Ellis	515-30-7550
Tom Valencour	470-46-3666	Loring Bryant	004-54-5967	Kent England	518-64-9188
Ben Tweedy	526-64-4486	Thomas Burdsal	527-54-7021	Bruc Eubank	527-96-1110

Barney Watters	380-05-3532	Michael Burkey	517-66-9729	Richard Eye	520-60-9614
Harry Wells	286-28-2730	Cecil Butler	018-36-9345	John Fink	526-64-1441
		Thomas Byrnes	216-26-3361	Ricky Fisk	527-21-6829
		Craig Caldwell	526-06-0797	Guillermo Fernandez	526-33-0906
		Dale Campbell	537-44-1282	Nelson Ferreira	019-22-8532
		Bill Carlton	527-32-1222	Charles Fleming	470-52-8512
		James Carpenter	526-58-0156	Doug Fleming	361-38-6140
		Alvin Carr	314-09-5238	Jose Flores	548-08-1369
		John Cheshier	527-94-0335	Paul Floyd	182-34-1375
		Michael Cheshier	527-94-0311	Richard Fortman	527-02-7228
		Ed Clark	585-36-3929	Billy Foust	412-84-7569
		Victor Clevidence	526-41-6210	Michael Frazer	526-94-7401
		Dennis Cohn	527-72-7151	Stephen Gallego	527-90-8373
		Mike Cole	537-37-9934	Doral Garcia	459-31-0796
		Richard Comeau	032-40-3877	Jurgen Gehre	384-54-8633
		Ed Comeau	020-24-3349	Larry Garcia	454-31-1802
		Carlos Conner	457-90-3794	Bernard Gesina	287-22-1772
		Donald Cook	517-22-3409	Joseph Graf	527-27-6495
		Steve Cortez	527-61-1989	Charles Glover	293-40-3192
		Robert Coziahr	349-32-2322	James Granger	585-20-9690
		George Cranz	527-96-3757	Darrell Green	585-06-0923
		Marcos Crockwell	548-42-4230	Glenn Green	527-02-5036
		Mike Davis	441-28-2988	Mary Green	286-36-6803
		James Del Pino	454-74-9510	Terry Green	527-74-7394
		William Dion	526-88-4511	Patrick Green	504-36-1968
		David Doyle	281-56-5182	Steven Hackett	526-94-9812
		Johnnie Douglas	526-80-6505	Charles Huber	187-20-8043
		Tom Dugan	526-27-0402	Steve Harding	527-02-0749
		Carl Erickson	299-22-4767	George Gillespie	527-17-9510
		Dick Esposito	050-34-6354	Joann Harrell	184-48-1336
		Donald Dunmire	347-44-9927	Ronald Harris	290-34-9124
		Jerome Dunn	343-30-9986	Stanley Hartman	485-30-1426
		Kim Eastman	004-40-2944	Gerald Harvey	463-70-2629

Name	SSN	Name	SSN	Name	SSN
SALARY		SALARY		SALARY	
Shannon Harwell	601-14-7571	Thomas Michaels	200-34-6868	James Smith	526-72-2707
Wayne Hatton	496-44-7380	Dwight Mickey	528-54-9211	Daniel Spargur	442-46-5338
Joel Head	526-25-7192	Lee Mickey	528-76-6994	Thomas Speelman	203-30-9022
Harry Heinbockle	151-09-8473	Guy Midkiff	556-55-7708	Steve Stapleton	526-08-5243
George Hinninger	506-54-2392	Donald Miller	526-72-8689	Roger Spicer	526-94-5371
Calvin Henry	526-84-1104	Jack Mirameyer	527-19-1331	Edward Stiller	203-24-0400
Gweenen Henderson	265-60-6395	Donald Montgomery	526-04-6542	Danny Strandhagen	262-72-8741
Robert Henry	527-17-9064	Lana Morely	532-48-7441	David Straws	537-56-8782
Paul Hofmann	527-37-5154	Gary Morrow	509-44-0115	Sammie Sturges	547-60-1748
Robert Hoppstetter	527-04-5855	Peter Moran	382-54-4056	Jo Ellen Sturm	527-06-6425
Zara Hudsen	480-36-4561	Howard Morse	370-30-9973	Daniel Sullivan	264-96-6047
Jim Hudspeth	526-04-4905	Barry Mosman	527-90-4429	Ronald Szerokman	232-62-5330
Dwain Hunt	473-38-0218	Sherry Munguia	526-64-0026	Robert Tarchala	312-34-3330
Kenneth Iley	527-19-0937	Jack Murphy	495-48-7943	Lee Thomas	375-48-2096
Jacob Ireland	527-98-6355	Mark Murphy	487-56-2201	Terry Terrigan	287-56-1146
Stephen Irwin	408-68-1451	Robert Nagy	585-70-8055	Joanne Titus	184-48-1336
Lewis Ivy	527-81-9254	Charles Nardin	531-40-1882	Lewis Turner	563-46-7759
Samuel Jaime	347-48-6197	Richard Nava	527-06-7896	Ernesto Valdez	527-60-3819
Gunard Johnson	274-56-8948	David Nelson	474-48-7253	John Vanheuvelen	372-28-5899
Robert Johnson	464-66-5087	John O'Brien	545-82-6707	David Vincent	513-54-4600
Ken Jones	492-96-8360	Brian Ogletree	526-06-3629	Merlin Vincent	527-21-2064
Thomas Jones	527-98-7331	Richard Osborn	526-58-3257	Robert Wilkes	526-70-9707
Michael Keen	529-92-8436	Mitchell Parker	526-19-0472	Stacy Williams	526-47-1125
John Kiley	446-48-2256	Janet Payton	526-19-3298	Robert Vaughan	528-58-8399
Richard King	543-52-7414	James Peddycoart	527-54-2959	Torger Walker	517-30-0729
Michael Kinler	526-92-8347	Scotty Perrin	527-02-0932	Patrick Walsh	543-54-2228
Ivan Knudsen	520-84-4659	Cheri Perrin	485-54-4788	Edward Ward	490-36-1652
Christina Kolatis	296-50-6256	Gary Pearcy	283-48-2472	Roy Webb	568-36-9275
Bele Konya	526-58-0111	Jack Peterson	252-18-7446	John Weger	335-26-9402
Rebecka Kroto	527-84-8085	John Plachy	138-46-1008	Charles Wethern	468-56-7794
Sherman Kunkle	175-03-6250	Leland Plumley	005-50-5883	James Whitaker	273-42-7103
David LaConte	271-46-6296	Israel Polanco	526-62-6148	Donald Whitney	016-18-4620

Jerry Larsen	527-70-8898	Ray Prasek	074-03-2874	Stanley Wild	527-94-1306
Michael Ledgerwood	444-42-6891	David Price	527-66-3854	Harry Walker	217-74-5856
John Lewis	526-06-2985	Richard Ramirez	526-19-0914	Harry Williams	279-46-3191
William Lewis	526-70-7805	Ray Danny	311-36-0858	Larry Wilson	561-80-0307
Richard Liedtke	136-66-2439	George Reding	515-14-6063	Randall Wooley	527-78-6774
Sherry Long	489-66-8324	Jim Redmon	526-94-6028	Donna Wright	527-23-7220
Richard Logsdon	305-30-8658	Frank Riley	527-66-8309		
Estevan Lopez	527-68-9556	Thomas Renderman	526-58-9123		
Manuel Loya	527-68-9950	Stephen Riley	526-27-1695		
Karl Ludwig	453-72-4504	David Riling	510-54-1272		
Dale Lunderville	527-02-0377	Jon Ripley	526-33-6882		
Albert Lujan	527-57-4927	John Robertson	526-66-2508		
Dale Mackey	527-60-7265	William Roberts	280-50-3105		
William Mackey	526-04-8649	Gerald Roll	208-26-3557		
Sergio Maldonado	520-66-9797	Louis Romero	526-60-4644		
Donald Manke	398-42-8194	Frank Rubalcava	527-23-8182		
Matthew Marsh	220-46-9901	J.B. Russell	315-50-9659		
Hiram McMillan	235-32-7950	Clifford Ryan	060-42-8780		
Robert Marker	526-72-8687	Willie Rodriguez	526-84-0494		
Harold Mattox	520-62-1062	David Salyer	527-78-5129		
Fred Matulin	272-28-0281	Manuel Suntoya	526-88-7904		
Mike Matulin	526-45-8020	Joe Scheuring	472-18-0930		
Robert Mays	465-34-3427	Thomas Schlensker	276-36-1578		
Larry McClendon	463-88-4135	Jeff Schoneck	526-17-8956		
Johnny McCollum	259-52-9787	Russell Schwatken	532-86-7866		
Jay McCready	526-02-4765	John Serino	526-59-4753		
William McCune	350-48-1630	Donald Sheldon	387-03-5596		
Thomas McKinley	084-40-2426	Antonio Silvas	526-98-9848		
Ronald McLellan	526-20-0532	Bill Sharpe	246-22-2850		
Olson McMurray	401-64-7393	Gary Skinner	447-44-8317		
Phillip McNally	283-14-4799	William Slay	383-62-2781		
Clifford Medlin	454-80-7993	Ernie Smith	047-26-6570		
Sue Myer	296-36-6769	Harold Smith	527-21-7084		

GL4096008229

INVOICE
PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

INVOICE DATE	EFFECTIVE DATES FROM	TO
11/16/98		

GENERAL ELECTRIC INTERNATIONAL PHONE (520) 740-3340 PERMIT CLASS: II
1401 E VALENCIA RD TUCSON

SITE AREA CODE 3 NO. 235

ITEM NO.	DESCRIPTION	TOTAL CAPACITY	UNITS	TOTAL	SCHEDULE
	OPENING BALANCE...			0.00	
4036	PERMIT PROCESSING FEE (NON COMPLEX)	1	1	565.00	12.510
4037	INSPECTION FEE (NON COMPLEX)	1	1	390.00	12.510

096 530[redacted]

TO AVOID LATE CHARGES PAY BY Jan 1st RETURN YELLOW COPY OF THIS INVOICE WITH CHECK MADE PAYABLE TO:

955.00 PAY THIS AMOUNT

GENERAL ELECTRIC INTERNATIONAL

1401 E VALENCIA RD
TUCSON AZ 85706

PIMA COUNTY DEPARTMENT OF
ENVIRONMENTAL QUALITY
130 WEST CONGRESS STREET
TUCSON, AZ 85701-1317

RETAIN THIS COPY FOR YOUR RECORDS

INVOICE

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

INVOICE DATE: 1/12/96

EFFECTIVE DATES FROM / TO:

GENERAL ELECTRIC CO PHONE 520-740-3340

1401 E VALENCIA RD TUCSON

SITE AREA CODE 3 NO. 235

ITEM NO.	DESCRIPTION	TOTAL CAPACITY	UNITS	TOTAL	SCHEDULE
	OPENING BALANCE...			0.00	
4036	PERMIT PROCESSING FEE (NON COMPLEX)	1	1	565.00	12.510
4037	INSPECTION FEE (NON COMPLEX)	1	1	390.00	12.510

RECEIVED
JAN 16 1996
LORIN G. HEWITT

CUSTOMER'S RECORD
CASHIER'S CHECK
DATE Jan. 17 1996

TO AVOID LATE CHARGES PAY BY 30 DAYS RETURN YELLOW COPY OF THIS INVOICE WITH CHECK MADE PAYABLE TO:

955.00 PAY THIS AMOUNT

GENERAL ELECTRIC CO

1401 E VALENCIA RD
TUCSON AZ
85706

RETAIN THIS COPY FOR YOUR RECORDS

PIMA COUNTY DEPARTMENT OF
ENVIRONMENTAL QUALITY
130 WEST CONGRESS STREET
TUCSON, AZ 85701-1317

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

130 WEST CONGRESS STREET · TUCSON, ARIZONA 85701-1317
PHONE 602-740-3340

NUMBER 235

AREA CODE 3

ISSUED TO GENERAL ELECTRIC CO
SITE GENERAL ELECTRIC CO
1401 E VALENCIA RD
TUCSON AZ 85706

AIR QUALITY OPERATING PERMIT

CONDITIONS:

1. COMPLIANCE WITH ALL APPLICABLE PROVISIONS OF THE RULES AND REGULATIONS OF THE PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY.
2. ADDITIONAL TERMS PER THE FOLLOWING CONDITIONS:

EFFECTIVE DATES FROM 06/01/93 TO 05/31/94

0080 0090 0010

GENERAL ELECTRIC CO

1401 E VALENCIA RD
TUCSON AZ 85706

DEPUTY AIR QUALITY CONTROL OFFICER

HAZARDOUS MATERIALS AUTHORIZATION

WATER QUALITY AUTHORIZATION

(SEE REVERSE SIDE)

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

130 WEST CONGRESS STREET · TUCSON, ARIZONA 85701-1317
PHONE 602-740-3340

NUMBER 1558

AREA CODE 2

ISSUED TO AMERIGAS
SITE AMERIGAS
1401 E VALENCIA RD
TUCSON AZ 85706

AIR QUALITY OPERATING PERMIT

RECEIVED
OCT 2 3 1992

CONDITIONS:

1. COMPLIANCE WITH ALL APPLICABLE PROVISIONS OF THE RULES AND REGULATIONS OF THE PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY.
2. ADDITIONAL TERMS PER THE FOLLOWING CONDITIONS:

EFFECTIVE DATES FROM 11/01/92 TO 10/31/93

AMERIGAS

PO BOX 50505
TUCSON AZ 85705

DEPUTY AIR QUALITY CONTROL OFFICER

HAZARDOUS MATERIALS AUTHORIZATION

WATER QUALITY AUTHORIZATION

(SEE REVERSE SIDE)

Telecopied to Kurt Lafferty 19
11-4-82

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

Barry York
8.235.05

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 20, 1982

In Reply
Refer to: T-3-1

Cal-T 8-452-2

Mr. Lorin G. Hewitt
Shop Manager
General Electric Company
1401 E. Valencia
Tucson, AZ 85706

Dear Mr. Hewitt:

The Environmental Protection Agency (EPA), the Arizona Department of Health Services, and the City of Tucson are jointly conducting an investigation of groundwater contamination in the vicinity of Tucson International Airport. The purpose of the investigation is to determine the nature, cause, and extent of contamination in the area and to assess the effects of the contamination on drinking water and the public health.

As part of this investigation the EPA is in critical need of historical and current information which has been generated or obtained by a variety of parties in the Tucson Basin. The EPA has reason to believe that your company may be in possession of critical information and, for that reason, I make the following request for information pursuant to §3007(a) of the Resource Conservation and Recovery Act (RCRA) and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA):

1. Description of the purpose and operations of your company, including a detailed description of any hazardous waste storage, treatment, or disposal operations at your facility.

2. A detailed description of all past and present usage of chlorinated solvents and chromium containing materials at your facility, including, but not limited to 1,1 Dichloroethylene, 1,1,2 Trichloroethylene, and 1,1,1 Trichloroethane.

3. A complete inventory of all wastes that have been generated by your facility, including, but not limited to,

clorinated solvents. Include dates, types of wastes or chemical composition, and quantities.

4. A complete inventory of all wastes disposed of at or near your facility, including, but not limited to, chlorinated solvents. Include dates, types of wastes or chemical composition, quantities, and disposal practices of past occupants of your present location.

5. If disposal of waste has been conducted off-site, name of transporter(s) and locations of off-site disposal.

6. Locations and detailed descriptions of all monitoring wells, supply wells, and injection wells at your facility.

7. All analyses from sampling of monitoring and supply wells at your facility.

8. Any information regarding the use and disposal of chlorinated solvents by any person or business in the vicinity of Tucson International Airport.

9. Length of time your company has been at the present location and any information regarding former occupants of your present location and their hazardous waste practices.

Each response should include all activities of your company since commencement of operations. The scope of this request extends to all data independently developed or obtained by research on the part of your company, its attorneys, consultants, or any of their agents, consultants, or employees.

Under the provisions of Section 3007(a) of RCRA [42 USC §6927], the Administrator of EPA may require persons subject to RCRA to furnish information necessary for EPA to administer the Act. Similarly, under Section 104(e) of CERCLA [42 USC §9604(e)], the Administrator of EPA may require persons subject to CERCLA to furnish information necessary for EPA to administer CERCLA.

Furthermore, under Section 3008 of RCRA [42 USC §6928], failure to provide the information requested in this letter may result in an order requiring compliance or a civil action for appropriate relief. This Section further provides for criminal penalties for knowingly making a false statement.

EPA regulations governing confidentiality of business information are set forth in Part 2, Subpart B of Title 40 of the Code of Federal Regulations. For any portion of the information submitted which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 CFR §2.203(b). If EPA determines that the information so designated meets the criteria set forth in 40 CFR §2.208, the information will be disclosed only to the extent, and by means of the procedures, specified in 40 CFR Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with your response to this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice.

Your response to this request must be by letter, signed by you or a duly authorized offical, and submitted to EPA within 30 days of receipt of this letter. If you have any questions concerning this matter, please contact Mr. Donald Harvey at (415)974-8386 or Mr. John Rothman at (415)974-7453.

Your cooperation in this matter is appreciated.

Sincerely yours,

Harry Seraydarian

for David S. Mowday
Acting Director
Toxics & Waste Management Division

cc: Arizona Department of Health Services

GENERAL ELECTRIC

DEPARTMENT
TUCSON APPARATUS SERVICE SHOP

GENERAL ELECTRIC COMPANY, 1401 EAST VALENCIA RD., TUCSON, ARIZONA 85706
Phone (602) 889-3346

November 18, 1982

United States Environmental
Protection Agency
215 Fremont Street
San Francisco, CA 94105

Reference: T-3-1

Attn: David S. Mowday, Acting Director Toxics and Waste Management Division.

Dear Mr. Mowday:

In reply to your October 20, 1982 letter:

1. Our facility at 1401½ E. Valencia Rd. in Tucson, Arizona has approximately 37K ft^2 of manufacturing space in which we are engaged in the maintenance and repair of industrial and mining equipment. This facility is classified as a small quantity generator of hazardous waste under RCRA regulations. Cleaning processes are involved in the repair operations. Most of the cleaning is done by steam cleaning. The waste generated by this process is discharged through an oil-water separator into the municipal sewer system. Stoddard solvent is also used for spray cleaning at an average consumption of 200 gal. per month.

2. Our records indicate that chlorinated solvents are used in aerosol cans for localized cleaning. Approximately 2500 cans of this aerosol cleaner are used per year. We can not find any records of purchasing other chlorinated solvents. Limited amounts of chromium containing materials are used in flame spray metalizing operations.

3. This is an estimate of waste disposal:

Waste Type	Yearly Quantity	Freq. of Disposal
Oil & Water Separator Oil and Sludge	9,000 Gal.	3-4 times annually
Trash	5,000 pounds	bi-monthly
Used gear oil	800 Gal.	Twice annually

continued.

GENERAL ELECTRIC

November 18, 1982
Ref: T-3-1
Page 2

4. We can find nothing that indicates any waste disposal at or near our facilities.

5. The trash is collected and disposed of by the City of Tucson. The grease separator waste and gear oil is trasported by Pima Sewer and Drain. It was reportedly dumped at Pima Count's Ina Road and Los Reales Dumps.

6. No wells on site.

7. N/A

8. We have no information regarding the use or disposal of chlorinated solvents.

9. General Electric established this facility at this location in 1969 and have occupied it since then.

If you have any questions concerning this information, please contact us.

Very truly yours,

Lorin G. Hewitt
Manager-Tucson Apparatus Service Shop

CC: Barry York
General Electric Company
1 River Rd. Bldg 6-233
Schenectady, New York 12345

Curt L. Lafferty
General Electric Company
4900 Kingston Street
Denver, Colorado 80239

dgs

#139

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

EPA ID No. AZD074463001
Report No. R(84)E185

14 JUN 1984

Denise Smith
Finance Representive
General Electric Company
1401 East Valencia
Tucson, Arizona 85706

Dear Ms. Smith:

On April 27, 1984, a hazardous waste investigation was conducted at your facility. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act of 1976. A copy of our investigation report is enclosed for your information.

If you have questions related directly to technical aspects of this report, please contact Tamara Brode at (415) 974-7407. Questions related to compliance with State hazardous waste laws should be directed to the Arizona Department of Health Services, Bureau of Waste Control at (602) 255-1160.

Sincerely yours,

Kathleen G. Shimmin
Chief, Field Operations Branch

Enclosure

cc: Bill Williams, AZDOHS (w/encl.)

RCRA INSPECTION REPORT

ENVIRONMENTAL PROTECTION AGENCY, REGION 9

TOXICS AND WASTE MANAGEMENT DIVISION

FIELD OPERATIONS BRANCH

Purpose:	RCRA Generator Investigation
Facility:	General Electric Company 1401 East Valencia Tucson, Arizona 85706
Facility ID Number:	AZD074463001
Report Number:	R(84)E185
Date of Inspection:	April 27, 1984
EPA Inspector:	Tamara Jo Brode Environmental Engineer
Facility Representatives:	Denise Smith Finance Representative
	Verlon Jenkins Service Manager
Report Prepared By:	Tamara Jo Brode
Report Date:	June 11, 1984

BACKGROUND

General Electric Company, Apparatus Service Division, Tucson, notified as a generator and transporter of hazardous waste in August of 1980. This GE facility repairs industrial electrical equipment, mostly equipment used in mining operations. No PCB equipment is accepted for repair.

INVESTIGATION

When the equipment arrives, the excess grease is scrapped off and collected in a drum for disposal as a solid hazardous waste.

Safety Solvent, a solvent manufactured by Stoddard, is used to degrease the equipment during servicing. This is an aliphatic hydrocarbon solvent with a flash point of 140°F. The spent solvent is drummed and disposed of at a hazardous waste disposal site.

Varnish is used to treat electrical windings. The varnish periodically "sets-up" before it can be used. When this happens, it is disposed of as a hazardous waste.

GE steam cleans oil and grease from parts. The residue is washed into an oil/water separator. The water is discharged to the city sewer. In accordance with GE's discharge permit issued by the city, the water is sampled and analyzed once every six months. The oil is contained in a large tank. The oil has not been removed from the tank for over two years.

GE claims they produce less than 40 gallons of waste per month. The following is a summary of quantities of hazardous waste shipped to a disposal site shown on manifests that are dated as indicated:

Date	# of drums	Approx. wt. (kg)
6/06/83	9	1688
7/25/83	8	1500
11/28/83	1	188
12/21/83	7	1313
12/21/83	2	375
1/01/84	10	1875
1/04/84	1	188
4/18/84	4	750

The average amount of waste shipped according to these manifests is approximately 590 kg/mo.

The hazardous waste notification indicates GE is a transporter and generator. According to their representatives and manifests, they do not, nor plan to, transport hazardous waste. GE should be withdrawn from the system since they meet the criteria for a small quantity generator.

ATTACHMENTS

A) Photographs

Air Emission Profile

Site Location: **Tucson Service Center**
1401 East Valencia Road, Tucson, AZ 85706-6098
Site Contact: Dave Shannon

Date Form Completed: September 8, 1994

Phone #: (602) 889-3346
Dial Comm: NONE

Are there any air permits currently in effect for this service center (Y or N): **YES**

Permitting Agency: State of Arizona DEQ via Pima County Air Quality Control District

---

Comments: Permit or Registered = (P) or (R). Please provide expiration date next to each designation.
No permit required = N/R.; **SEE NOTES BELOW**

Basis for Permit and/or Registration (enter data where applicable)				
Source	Pollutant	Estimated Emission Rate (ton/year)	Control Equipment	Comments (Note if source is "P"ermitted or "R"egistered)
Armature Burn-out Oven	VOC	0.75	NONE	(P)"; No. 235 exp. 5/31/94; Emissions estimated by Doug @ Pima County Air (740-3340)
Stator Burn-out Oven	VOC	1.15	Afterburner	(P)"; No. 235 exp. 5/31/94; Emissions estimated by Doug @ Pima County Air (740-3340)
Propane Storage & dispense	VOC	Not Estimated*		(P); No. 1558, issued to Amerigas
Paint booth (new source)	VOC	Not Estimated*	Dry Filters	New Application Submitted
Roll Bake Oven (new source)		Not Estimated*		New Application Submitted

A formal air emission source inventory, pollutant survey, emission rate determination and regulation review was started September 15, 1994. The task was contracted to Harding Lawson Associates, Jon D. Bebbington, 2400 ARCO Tower, 707 Seventeenth Street, Denver, CO 80202, (303) 292-5365. After reviewing both State and Federal regulations, a determination will be made as to whether permits are required and if needed will be written using the data developed from the current inventory and emission rates. The consultants report is to be made available October 10, 1994.

Tucson was notified that they will be required to apply for all new air permits for their existing sources sometime during 1994 or 1995. The State of Arizona will make the request through Pima County Air Quality. This process results from Arizona aligning their regulations to meet the new Federal Standards. No applications will be accepted until the permitting agency makes the request.

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

150 WEST CONGRESS STREET • TUCSON, ARIZONA 85701-1317
PHONE 602-740-8618

NUM 33(

AREA CODE 3

ISUED TO GENERAL ELECTRIC CO
TE GENERAL ELECTRIC CO
1401 E VALENCIA RD
TUCSON AZ 85706

AIR QUALITY OPERATING PERMIT

NDITIONS:

COMPLIANCE WITH ALL APPLICABLE PROVISIONS OF THE RULES AND REGULATIONS OF THE PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY.
ADDITIONAL TERMS PER THE FOLLOWING CONDITIONS:

EFFECTIVE DATES
FROM 06/01/91 TO 05/31,

0080 0090 0010

GENERAL ELECTRIC CO

1401 E VALENCIA RD
TUCSON AZ 85706

DEPUTY AIR QUALITY CONTROL OFFICER

HAZARDOUS MATERIALS AUTHORIZATION

WATER QUALITY AUTHORIZATION

SEE REVERSE SIDE

1401 E VALENCIA RD
TUCSON AZ 85706

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1401 E VALENCIA RD
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SEE REVERSE SIDE

PIMA COUNTY AIR QUALITY CONTROL DISTRICT

PERMIT CONDITION 0010

INCINERATORS/BURNOUT OVENS

The incinerator/burnout oven may only be operated during daylight hours (sunrise to sunset).

PIMA COUNTY AIR QUALITY CONTROL DISTRICT

PERMIT CONDITION 0080

SANDBLASTING

Emissions from a sandblasting or other abrasive blasting operation must be minimized by applying water to suppress visible emissions (wet blasting), totally enclosing the operation, or use of other equivalently effective controls.

PIMA COUNTY AIR QUALITY CONTROL DISTRICT
PERMIT CONDITION 0090 - PAINT AND FIBERGLASS SPRAYING

Paint or fiberglass spraying must be conducted in such a manner as to prevent airborne particulates, droplets, aerosols, or odors from crossing the emission source's property lines.

Enclosures are required except for the following types of operations: hot painting, architectural coating, and structural coating. Architectural coating is defined as a coating applied externally, commercially, or industrially to buildings and their appurtenances. Structural coating is defined as a coating applied externally, commercially, or industrially to structural steel, storage tanks, bridges, [illegible], girders, and other fabrications whose size is such that an enclosure is impractical.

The permittee shall keep accurate records of all solvents used in each permitted operation and shall supply to the Control Officer, upon request, written evidence of the chemical composition, physical properties, and the amount consumed and recovered for each organic solvent used.

PERMIT NUMBER 235 PERIOD BEGINNING 1/10 PERIOD ENDING 4-91

COMPLETE FOR ALL SURFACE COATING COMPOUNDS, DEGREASING COMPOUNDS, DRY CLEANING SOLVENTS, AND ALL OTHER SOLVENT PRODUCTS.

NUMBER OF DAYS OPERATED PER YEAR 312 NUMBER OF SHIFTS PER DAY 2 NUMBER OF HOURS PER SHIFT 8

TYPE AND REASON FOR USE INDICATE SOLVENT TYPE AND HOW IT'S USED. E.G., PAINTING, THINNING, PRIMING, DRY CLEANING, DEGREASING, OR OTHER (PLEASE SPECIFY)	AMOUNT USED INDICATE THE AMOUNT OF EACH SOLVENT USED (IN GALLONS) DURING THE PERIOD	MANUFACTURER INDICATE THE BRAND NAME AND MANUFACTURER OF EACH SOLVENT PRODUCT	RECYCLED SHOW HOW MUCH SOLVENT PRODUCT WAS RECOVERED OR RECYCLED (IN GALLONS) IF ANY	DISPOSAL INFORMATION IF YOU DISPOSE OF ANY SOLVENT PRODUCTS, INDICATE HOW MUCH (IN GALLONS) AND METHOD OF DISPOSAL
EXAMPLE: AIR DRY ENAMEL USED IN PAINTING OPERATION	*EXAMPLE: 150 GALLONS*	*EXAMPLE: EXCELO ENAMEL MADE BY DUPONT*	*EXAMPLE: 30 GALLONS*	*EXAMPLE: 25 GALLONS DISPOSED OF WITH DISPOSAL CO.*
AIR DRY ENAMEL USED IN PAINTING OPERATIONS	80 GALLONS	QUICK DRY ENAMEL MADE BY PIONEER	N.A.	N.A.
MISC SPRAY PAINT (CANS)	40 GALLONS	GLYPTAL MADE BY GLYPTAL INC	N.A.	N.A.
SPRAY VARNISH FOR MOTORS	40 GALLONS	UNSATURATED POLYESTER MADE BY GE	N.A.	N.A.
DIP TANK VARNISH	100 GALLONS	UNSATURATED POLYESTER MADE BY GE.	N.A.	N.A.
THINNER FOR DIP TANK & VPI TANK	500 GALLONS	THINNER MADE BY PIONEER	N.A.	N.A.
INHIBITOR FOR VPI	30 GALLONS	702 MADE BY GE	N.A.	N.A.
MATERIAL FOR CRACK DETECTION	30 GALLONS	1011, 1012, 1013 MADE BY Chemtronics	N.A.	RAGS USED WITH THIS CLEANED BY TODD LINEN

COMPANY NAME GENERAL ELECTRIC CO

ADDRESS 1401 E VALENCIA ROAD

TELEPHONE TUCSON, AZ 85706

SIGNATURE AND DATE Tom Evans 4-12-91

RETURN TO: PIMA COUNTY AIR QUALITY CONTROL DISTRICT
150 W. CONGRESS
TUCSON, AZ 85701 PHONE: 740-8686

FAILURE TO PROVIDE COMPLETE AND ACCURATE INFORMATION COULD RESULT IN PERMIT REVOCATION AND PROSECUTION BY THE PIMA COUNTY ATTORNEY (REF TITLE 17; 17.24.030, REPORTING FOR COMPLIANCE EVALUATION)

EI FORM 0-2

PERMIT NUMBER 235 PERIOD BEGINNING 1-10 PERIOD ENDING 4-91

COMPLETE FOR ALL SURFACE COATING COMPOUNDS, DEGREASING COMPOUNDS, DRY CLEANING SOLVENTS, AND ALL OTHER SOLVENT PRODUCTS.

NUMBER OF DAYS OPERATED PER YEAR 312 NUMBER OF SHIFTS PER DAY 2 NUMBER OF HOURS PER SHIFT 8

TYPE AND REASON FOR USE INDICATE SOLVENT TYPE AND HOW IT'S USED. E.G., PAINTING, THINNING, PRIMING, DRY CLEANING, DEGREASING, OR OTHER (PLEASE SPECIFY)	AMOUNT USED INDICATE THE AMOUNT OF EACH SOLVENT USED (IN GALLONS) DURING THE PERIOD	MANUFACTURER INDICATE THE BRAND NAME AND MANUFACTURER OF EACH SOLVENT PRODUCT	RECYCLED SHOW HOW MUCH SOLVENT PRODUCT WAS RECOVERED OR RECYCLED (IN GALLONS) IF ANY	DISPOSAL INFORMATION IF YOU DISPOSE OF ANY SOLVENT PRODUCTS, INDICATE HOW MUCH (IN GALLONS) AND METHOD OF DISPOSAL
EXAMPLE: AIR DRY ENAMEL USED IN PAINTING OPERATION	*EXAMPLE: 150 GALLONS*	*EXAMPLE: EXCELO ENAMEL MADE BY DUPONT*	*EXAMPLE: 30 GALLONS*	*EXAMPLE: 25 GALLONS DISPOSED OF WITH DISPOSAL CO.*
AIR DRY ENAMEL USED IN PAINTING OPERATIONS	80 GALLONS	QUICK DRY ENAMEL MADE BY PIONEER	N.A.	N.A.
MISC SPRAY PAINT (CANS)	40 GALLONS	GLYPTAL MADE BY GLYPTAL INC	N.A.	N.A.
SPRAY VARNISH FOR MOTORS	40 GALLONS	UNSATURATED POLYESTER MADE BY GE	N.A.	N.A.
DIP TANK VARNISH	100 GALLONS	UNSATURATED POLYESTER MADE BY GE	N.A.	N.A.
THINNER FOR DIP TANK & VPI TANK	500 GALLONS	THINNER MADE BY PIONEER	N.A.	N.A.
INHIBITOR FOR VPI	30 GALLONS	702 MADE BY GE	N.A.	N.A.
MATERIAL FOR CRACK DETECTION	30 GALLONS	1011, 1012, 1013 MADE BY Chemtronics Products	N.A.	RAGS USED WITH THIS CLEANED BY TOOL LINEN

COMPANY NAME GENERAL ELECTRIC CO

ADDRESS 1401 E VALENCIA ROAD

TELEPHONE TUCSON, AZ 85706

SIGNATURE AND DATE [signature] 4-12-91

RETURN TO: PIMA COUNTY AIR QUALITY CONTROL DISTRICT
150 W. CONGRESS
TUCSON, AZ 85701 PHONE: 740-8686

FAILURE TO PROVIDE COMPLETE AND ACCURATE INFORMATION COULD RESULT IN PERMIT REVOCATION AND PROSECUTION BY THE PIMA COUNTY ATTORNEY (REF TITLE 17; 17.24.030, REPORTING FOR COMPLIANCE EVALUATION)

EI FORM 0-2

(35) EMISSIONS INVENTORY QUESTIONNAIRE (☑ Period Beginning 4/90 Ending 1/90

Complete for all waste, pathological and crematory incinerators.

#Shifts per day 2 #Hrs. per shift 8 #Days Operated per year 312

Type Incinerator	Number Of Days Operated	Quantity Burned Per Day (In Pounds)	Type Air Pollution Control Device (if applicable)
ARMATURE BURN OUT OVEN	40	10	N.A.
STATOR BURN OUT OVEN	30	15	N.A.

(For AQCD Use Only)

E_{Part}	E_{SOX}	E_{HC}	E_{CO}	E_{NOX}

Return to:
Pima County Air Quality Control District
150 West Congress St.
Tucson, AZ 85701

Company Name GENERAL ELECTRIC CO Signature [signature]

Address 1401 E VALENCIA RD, TUCSON Title MGR-ARIZONA OPERATION

Telephone Number 889-3346 Date 11-12-91

Form EI-10

(35 EMISSIONS INVENTORY QUESTIONNAIRE (☒ Period Beginning 1/90 Ending 12/90

Complete for all waste, pathological and crematory incinerators.

#Shifts per day 2 #Hrs. per shift 8 #Days Operated per year 312

Type Incinerator	Number Of Days Operated	Quantity Burned Per Day (In Pounds)	Type Air Pollution Control Device (If applicable)
ARMATURE BURN OUT OVEN	40	10	N.A.
STATOR BURN OUT OVEN	30	15	N.A.

(For AQCD Use Only)

E_{Part}	E_{SOX}	E_{HC}	E_{CO}	E_{NOX}

Return to:
Pima County Air Quality Control District
150 West Congress St.
Tucson, AZ 85701

Company Name GENERAL ELECTRIC CO Signature [signature]

Address 1401 E VALENCIA RD, TUCSON Title MGR-ARIZONA OPERATION

Telephone Number 889-3346 Date 11-12-91

Form EI-10

...day 2 Hrs. per shift 8 Days Operated per year 312

...te for all waste, p... ...logical and crematory incinerators.

...period beginning 4/90 Ending 3/90

Type Incinerator	Number Of Days Operated	Quantity Burned Per Day (In Pounds)	Type Air Pollution Control Device (if applicable)
ARMATURE BURN OUT OVEN	40	10	N.A.
STATOR BURN OUT OVEN	30	15	N.A.

(For AQCD Use Only)

E_{Part}	E_{SOX}	E_{HC}	E_{CO}	E_{NOX}

...mpany Name General Electric Co Signature Tom Hawes

...ress 1401 E Valencia Rd, Tucson Title Mgr-Arizona Operation

...ar 889-3346 Date 4-12-91

Return to:
Pima County Air Quality Control District
150 West Congress St.
Tucson, AZ 85701

Form EI-10

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

150 WEST CONGRESS STREET • TUCSON, ARIZONA 85701-1317

PHONE 602-740-6818 AREA CODE 3

NUM

TO GENERAL ELECTRIC CO
E GENERAL ELECTRIC CO
1401 E VALENCIA RD
TUCSON AZ 85706

AIR QUALITY OPERATING PERMIT

EFFECTIVE DATES
FROM 06/01/91 TO 05/31/

NDITIONS:

COMPLIANCE WITH ALL APPLICABLE PROVISIONS OF THE RULES AND REGULATIONS OF THE PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY.
ADDITIONAL TERMS PER THE FOLLOWING CONDITIONS:

0080 0090 0010

GENERAL ELECTRIC CO

1401 E VALENCIA RD
TUCSON AZ 85706

DEPUTY AIR QUALITY CONTROL OFFICER

HAZARDOUS MATERIALS AUTHORIZATION

WATER QUALITY AUTHORIZATION

SEE REVERSE SIDE

Wastewater Discharge Survey

Site Location: *Tucson, Arizona*

Site Contact: *Dave Shannon*
Telephone Number: *(602) 889 - 3346*
Dial Com Number: *8 - 889 - 3346*

Description of Operations

The Tucson ASD service shop performs maintenance and repairs on industrial and utility electrical equipment. This equipment includes large motors, generators, transformers, circuit breakers, and switchgear.

Total Average Plant Wastewater Discharge Flow Rate: *5000 gpd*
Company Performing Sampling for Wastewater Permit: *Copper State Analytical Labs*
Company Performing Analysis for Wastewater Permit: *Copper State Analytical Labs*
Frequency Sampling is Performed: *Semi - Annually*
Dates When Wastewater Reports are Due: *Semi - Annually*

Wastewater Treatment Facility On - Site? : *Yes - Oil/Water Separator*

Permits

Permit Type	Required?	Date Issued	Expiration Date
POTW	*Required*	*11/1/94*	*10/31/99*
Stormwater	*Not Required*		
NPDES	*Not Required*	*N/A*	*N/A*
SPDES	*Not Required*	*N/A*	*N/A*
Municipality	*Not Required*	*N/A*	*N/A*

Monitoring Data

Parameter	Permit Limit (mg/L)	Type of Monitoring	Monitoring Frequency
Oil & Grease	200	Grab	Semi - Annual
Total Suspended Solids	Monitor Only	24 hr. Composite	Semi - Annual
Flow	Monitor Only	Estimation	Monthly
Cadmium (total)	0.1	24 hr. Composite	Semi - Annual
Copper (total)	2.7	24 hr. Composite	Semi - Annual
Lead	0.5	24 hr. Composite	Semi - Annual
Petroleum Hydrocarbons	Monitor Only	24 hr. Composite	Semi - Annual
Phenols (species)	Monitor Only	24 hr. Composite	Semi - Annual
Zinc	2.6	24 hr. Composite	Semi - Annual
Ignitability (flashpoint)	> 140 °F	Grab	Semi - Annual
pH	6.0 - 9.0	Grab	Semi - Annual

Major Permit Issues/Other Issues: *N/A*

Status of Stormwater Permits: *N/A*

Date Prepared: *11/22/95*
Date Printed: 1/18/96

Wastewater Discharge Survey

Site Location: **Tucson, AZ**

Date form completed: 7/14/94

Site Contact: Dave Shannon

Phone #: (602) 889 - 3346
Dial Com: 8 * 889 - 3346

Description of Operations: Repairing of AC DC motors, transformers, and other equipment used in industrial operations

Wastewater treatment facility on site? (Y or N): Yes, oil / water separator

Permit Type: (Y or N)		Date Issued:	Expiration Date:
NPDES:	N		
SPDES:	N		
POTW:	Y	1/1/89	1/1/94
Stormwater:	N		
Municipality:	N		

Monitoring Data:

Parameter	Permit Limit (mg / L)	Type of Monitoring	Monitoring Frequency
pH	6.0 - 9.0	Grab	Semiannual
Copper	2.7	Composite	"
Lead	0.5	Composite	"
Oil & grease	200	Grab	"
Total Suspended Solids	monitor only	Composite	"
Cadmium	0.1	Composite	"
Phenols	0.05	Composite	"
Flow	monitor only	estimation	Monthly

Major Permit Issues / Other Issues: Contacted George Brinsko of the Pima County Wastewater Management Dept. on 10/6/94, and he is sending the current wastewater discharge permit to ASD - HQ.

Status of Stormwater Permits:

Phone: 602 888 48
Fax: 602-293-467

PIMA COUNTY WASTEWATER MANAGEMENT
INDUSTRIAL WASTEWATER CONTROL
SELF MONITORING REPORT FORM

contact: Nick

PART I. BUSINESS INFORMATION (Make necessary corrections)

Name: General Electric Company
Permit No: 58-10409
Mailing Address: 1401 E Valencia Rd, Tucson, AZ 85706-6098
Service Address: 1401 E Valencia Rd, Tucson, AZ 85706-6098

Fax from Tracey Showing Tucson Parameters Monitoring
11/14/95
Mike Rogers

PART II. REPORT INFORMATION

SAMPLING PERIOD: 01/01/1995 TO 07/01/1995 REPORT DUE: 07/28/1995
PERMIT EXPIRATION DATE: 10/31/1999 PERMIT RENEWAL DATE: 04/30/1999

PART III. MONITORING REQUIREMENTS (Fill in the blanks)

A. ANALYSIS LIMITS AND RESULTS:

PARAMETER	LIMITS	SAMPLE FREQ	PERMITTED SAMPLE TYPE	ACTUAL SAMPLE TYPE	NAME OF SAMPLER	SAMPLE DATE	RESULTS
Cadmium (total)	0.1 mg/l	6 No.	Composite	Composite	Nick Altamirano	2/6/95	NOD.05
Chemical Oxygen Demand	***	6 No.	Composite	Composite	Nick Altamirano	2/6/95	390
Copper (total)	1.2 mg/l	6 No.	Composite	Composite	Nick Altamirano	2/6/95	0.15
Ignitability (Flashpoint)	> 140°F	6 No.	Grab	Grab	GE	7/21/95	212 °F
Lead (total)	0.5 mg/l	6 No.	Composite	Composite	Nick Altamirano	2/6/95	NO(0.1
Oil and Grease	200 mg/l	6 No.	Grab	Grab	Nick Altamirano	2/6/95	146
Petroleum Hydrocarbons (total)	***	6 No.	Grab	Grab	GE	7/21/95	420 ppm
Phenol (species)	***	6 No.	Grab	Grab	GE	7/21/95	varies
Zinc (total)	2.6 mg/l	6 No.	Composite	Composite	Andrew Shan	6/8/95	0.85
pH	6.0-9.0 S.U.	6 No.	Grab	Grab	Nick Altamirano	2/6/95	6.3

Sample Location #01 ✓ Clean out at the discharge side of the oil and sand interceptor. Ran EPA 604 for Phenol (species). All ND except ↓

2-nitrophenol 25.1 PPB
2,4-dimethylphenol 1.8 PPB

B. LABORATORY INFORMATION: (Check which is applicable and fill in the blank)

Samples were taken by an independent lab [✓]
Samples were not taken by an independent lab [ ]
Name of Lab: Copper State Analytical

C. WASTEWATER FLOW INFORMATION: (Fill in the blanks)

Note: 1 CCF = 100 Cubic Feet = 748 Gallons

Sample Location #01
Estimated Flow (daily average)

Date:	1/23/95	2/20/95	3/21/95	4/20/95	5/19/95	6/20/95
Flow (GPD):	1520	1309	1158	2169	3230	6733

PART IV. OTHER REPORTING REQUIREMENTS (Attach and submit with this form)

*** = Monitoring and reporting required. No limits set at this time.

Name: General Electric Company
Permit No: 58-10409
Mailing Address:
1401 E Valencia Rd
Tucson AZ 85706-6098

Service Address:
1401 E Valencia Rd
Tucson AZ 85706-6098

PART V. REPORT CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Tracy Miller 7,27,95

Authorized Representative: Ms. Tracey Miller Date:

Mail completed Report to: Pima County Wastewater Management Department, Technical Services Section, Industrial Wastewater Control, 2600 West Sweetwater Drive, Tucson, AZ 85705

NRF Report for Permit Number SG-10403
General Electric Company between dates 01/01/1994 and 08/01/1995

Parameter	Sample Type	Result	Unit	Sample Date
Copper (total)	Composite	0.09	mg/l	08/29/1994
Flow (daily average)	Estimated	9096	Gallons	07/01/1994
Flow (daily average)	Estimated	7649	Gallons	08/29/1994
Flow (daily average)	Estimated	8352	Gallons	09/01/1994
Flow (daily average)	Estimated	4319	Gallons	10/01/1994
Flow (daily average)	Estimated	2194	Gallons	11/23/1994
Flow (daily average)	Estimated	1182	Gallons	12/01/1994
Flow (hourly maximum)	Estimated	40	Gallons	07/01/1994
Flow (hourly maximum)	Estimated	35	Gallons	08/29/1994
Flow (hourly maximum)	Estimated	40	Gallons	09/01/1994
Flow (hourly maximum)	Estimated	30	Gallons	10/01/1994
Flow (hourly maximum)	Estimated	30	Gallons	11/23/1994
Flow (hourly maximum)	Estimated	25	Gallons	12/01/1994
Lead (total)	Composite	<0.01	mg/l	08/29/1994
Oil and Grease	Grab	44	mg/l	08/29/1994 ✓
Oil and Grease	Grab	15	mg/l	11/23/1994 ✓
Phenol (total) (420.1)	Composite	<0.006	mg/l	08/29/1994
Total Suspended Solids	Composite	104	mg/l	08/29/1994
pH	Grab	7.5	S.U.	08/29/1994

NRF Date: 07/28/1995

New parameters per permit issued 11.1.94

NRF Letter generated on 06/06/1995.

Parameter	Sample Type	Result	Unit	Sample Date
Cadmium (total)	Composite		mg/l ✓	
Chemical Oxygen Demand	Composite		mg/l ✓	
Copper (total)	Composite		mg/l ✓	
Flow (daily average)	Estimated		Gallons	
Flow (daily average)	Estimated		Gallons	
Flow (daily average)	Estimated		Gallons	
Flow (daily average)	Estimated		Gallons	
Flow (daily average)	Estimated		Gallons	
Flow (daily average)	Estimated		Gallons	
Ignitability (Flashpoint)	Grab		°F ✓*	
Lead (total)	Composite		mg/l ✓	
Oil and Grease	Grab		mg/l ✓	
Petroleum Hydrocarbons (total)	Grab		ug/l *	
Phenol (species)	Grab		ug/l *	
Zinc (total)	Composite		mg/l *	
pH	Grab		S.U. ✓	

* New parameters, need to be analyzed.

Post-it™ brand fax transmittal memo 7671 | # of pages ▸

To Dave Shanner	From Shawnice Se
Co. GE Tucson	Co. GE ASD
Dept. EHS Coord	Phone # 8*235-33(
Fax # (602)889-3341	Fax # 8*235-87

Date: March 14, 1995

To: EHS Coordinators at Wastewater Permitted Sites

From: Shawnice Sekela

Subject: Wastewater Strategy Survey

Headquarters is in the process of formulating a wastewater strategy for each service center. To do this, we are requesting each service center to fill out the short survey below. Since the completed wastewater strategies are due by March 30, 1995, we are asking you to fill out this survey and return it to us in a timely manner.

This survey can be returned via MS mail, or a hard copy should be faxed to me at 8*235-8714. If you have any questions, please don't hesitate to call me at 8*235-3308. Thank you.

Sincerely,

Shawnice L Sekela

Shawnice Sekela
Environmental Engineer
EHS-ASD Headquarters

Service Center: Tucson
EHS Coordinator: D. Shanner
Phone Number: 700-889-3346

Total Average Plant Wastewater Discharge Flow Rate: 5000 **gpd**

Company Performing Sampling for WW Permit: Copper State Analytical Lab

Company Performing Analysis for WW Permit: Copper State

How often is sampling performed? (ie: twice a month, bimonthly, etc.)

Bi Annual

When is sampling performed? (ie: first day of every month, etc.)

When are wastewater reports due? (ie: quarterly, monthly, etc.)
--please include DATES of when reports due as well

Bi Annual

This document has important legal consequences. Read and understand all of the requirements and conditions stated herein.

Reapplication No.: 19208
Page 1 of 4
Permit No.: 5G 10409

PART I

INDUSTRIAL WASTEWATER DISCHARGE PERMIT
PIMA COUNTY WASTEWATER MANAGEMENT DEPARTMENT

In compliance with the provisions of the Clean Water Act, as amended (33 U.S.C. 1251 et seq., the "Act"),

General Electric Company

is authorized to discharge wastewater from the noted business located at 1401 East Valencia Road, Tucson, Arizona

to the Pima County public sanitary sewerage system contributory to the Roger Road Wastewater Treatment Plant

in accordance with Pima County Code, Title 13, Chapter 36, effluent limitations, monitoring requirements and other conditions set forth herein, and in the attached eleven pages of Pima County "Standard Permit Conditions," dated December 10, 1991.

This Permit renewal is effective November 1, 1994.

This Permit, and the authorization to discharge industrial wastewaters, shall expire at midnight on October 31, 1999.

Signed this 19th day of October 1994

George A. Brinsko

George A. Brinsko, Director
Pima County Wastewater Management Department

GE Apparatus Services

Tucson Service Center
General Electric Company
1401 E. Valencia Road, Tucson, AZ 85706-6098
602 889-3246 Fx: 602 889-3341

October 17, 1994

To: Carol Carey
From Tom Hawse

Subject: Pima County Wastewater Discharge Permit

As you know, the Tucson Service Center's Wastewater Discharge Permit expired on January 1, 1994.

We submitted an application for renewal of the permit during August of 1993, well within the 180 day window required in the permit.

On September 12, 1994 the facility was inspected by Mr. Paul Mangold from the Wastewater Technical Services Group. His comment at the closeout was that everything looked good and that he would process the permit for renewal.

On today's date, I attempted to contact Mr. Mangold and was told that both he and Mr. Lasalla (Unit Supervisor) were on vacation this week.

I spoke with Mr. Mike Maloney of the Compliance Unit. He is the person you talked to recently. He sent you a copy of our existing permit.

Mr. Maloney confirmed that our permit is still in effect until the renewal is issued

Tom Hawse
Manager-Arizona Operation

PIMA COUNTY
WASTEWATER MANAGEMENT DEPARTMENT
130 WEST CONGRESS
TUCSON, ARIZONA 85701
REPLY TO 800 WEST CONGRESS
TUCSON, ARIZONA 85745
PH: 884-8811

GEORGE A. BRINSKO
Director

PH: 792-8676

December 22, 1988

Mr Tom Hawse
General Electric Co
1401 E Valencia Rd
Tucson, AZ 85706-6098

Certified No.: P 832 170 816

RE: INDUSTRIAL WASTEWATER DISCHARGE PERMIT

APPLICATION NO.: 04286

PERMIT NO.: 5G 10409

NAME AND SERVICE ADDRESS:

General Electric Co
1401 E Valencia Rd
Tucson, Arizona

Dear Mr. Hawse:

Enclosed please find a signed and dated Industrial Wastewater Discharge Permit for the discharger at the location indicated above. This Permit becomes effective on the date as noted.

This document has important legal consequences. Read and understand all of the requirements and conditions stated herein.

The Pima County Wastewater Management Department appreciates your cooperation in this effort to protect our groundwater and the public sanitary sewerage system.

If questions arise, please contact the Industrial Wastewater Control Group at 884-8811.

Very truly yours,

George A. Brinsko
Director

GAB:cjb
Enclosures

This document has important legal consequences. Read and understand all of the requirements and conditions stated herein.

Application No.: 04286
Page 01 of 11
Permit No.: SG 10409

INDUSTRIAL WASTEWATER DISCHARGE PERMIT
PIMA COUNTY WASTEWATER MANAGEMENT DEPARTMENT

General Electric Co

is authorized to discharge wastewater from the noted business located at 1401 E Valencia Rd, Tucson, Arizona

to the Pima County public sanitary sewerage system contributory to the Roger Road Wastewater Treatment Plant

in accordance with Pima County Industrial Wastewater Ordinance, Pima County Wastewater Management Department Directive DO-D-14, applicable Federal, State and Local regulations and the conditions included in this Permit.

This Permit is effective January 1, 1989.

This Permit, and the authorization to discharge industrial wastewaters shall expire at 12:01 a.m. on January 1, 1994.

Signed this 22nd day of December, 1988

George A. Brinsko, Director
Pima County Wastewater Management Department

ORIGINAL POSTED 12-28-88

PART I

A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

1. Authorization.

During the effective period of the Permit, the Permit holder is authorized to discharge to the COTW and all discharged industrial wastewater shall pass through a designated sampling location as indicated in Part I.A.2., of this Permit.

2. Sampling Location.

Samples shall be taken at the discharge side of the oil and sand interceptor or at the cleanout on the discharge side of the interceptor.

3. Limitations.

Such discharges shall be limited and monitored by the Permit holder as specified below:

DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS (Sampling)	
Parameters	Limitations	Type	Frequency
pH	6.0-9.0 (minimum/maximum) (for any time)	Grab	Once per six months
Copper (total)	2.7 mg/L Daily Average	Composite (1)	Once per six months
Cadmium (total)	0.1 mg/L Daily Average	Composite	Once per six months
Lead (total)	0.5 mg/L Daily Average	Composite	Once per six months

(1) A composite sample is a combination of no fewer than eight (8) individual portions obtained at equal time or flow intervals for 24 hours or for the duration of discharge whichever is shorter.

3. Limitations. (Continued)

DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS (Sampling)	
Parameters	Limitations	Type	Frequency
Oil & Grease	200 mg/L Maximum for any time	Grab	Once per three months
Phenols (total)	0.05 mg/L Daily Average	Composite	Once per six months
Chemical Oxygen Demand	-- --	Composite	Once per six months
Total Suspended Solids	-- --	Composite	Once per six months
Flow (daily average)	-- --	Estimation (2)	Once per month
Flow (hourly maximum)	-- --	Estimation (3)	Once per month

(2) Flow estimations shall be based on the actual wastewater discharged through each permitted sample location.

(3) Hourly maximum flow values (gpd) shall be based on the maximum flow capacity possible, for one hour, through the permitted sample location.

4. Other Monitoring Requirements

a. Records shall be kept for each cleaning of the oil and sand interceptor, including the amount removed, the company or individual doing the cleaning and the date of cleaning.

b. Samples shall be taken within one week prior to cleaning the oil and sand interceptor and taken during the high discharge periods of a representative day.

c. Records shall be kept showing collection of waste solvents, contaminated fuels, degreasers and oil and grease including, but not limited to, amounts, name of the company or individual collecting these wastes, the date of collection.

B. COMPLIANCE SCHEDULE

The Permit holder shall comply with the Discharge Limitations specified in Part I of this Permit, and in accordance with the compliance schedule contained in Part III of this Permit.

No later than 14 calendar days following each date identified in the above referenced compliance schedule, the Permit holder shall submit a written report of progress and the probability of meeting the next scheduled requirement.

C. MONITORING AND REPORTING

1. Representative Sampling.

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge and shall be taken in accordance with the monitoring requirements of Part I.A.3, of this Permit.

2. Additional Monitoring by Permit Holder.

If the Permit holder monitors any pollutant at the locations designated herein more frequently than required by this Permit, using approved analytical methods as specified below, the results of such monitoring shall be included in the Discharge Monitoring Report, and the frequency shall also be indicated.

3. Test Procedures.

Test procedures for the analysis of pollutants shall conform to the U.S. EPA test procedures as designated in Guidelines Establishing Test Procedures for the Analysis of Pollutants (40 CFR 136). All samples shall be analyzed by a laboratory certified by the Arizona Department of Health Services (ADHS), State Laboratory, Laboratory Licensure Section. A list of certified laboratories can be obtained from the ADHS Laboratory Licensure office at 255-1188. Daily sampling and anaylsis may be performed by on-site personnel.

4. Recording of Results.

For each measurement or sample taken pursuant to the requirements of this Permit, the Permit holder shall record or have the laboratory record the following information:

a. The exact place, date, and time of sampling;

b. The date the analysis was performed by the laboratory;
c. The persons who performed the sampling and analysis;
d. The type of containers used and their preparation, the preservatives used (if needed), and the analytical techniques or methods used;
e. The results of all required analyses;
f. A signature of the laboratory representative attesting to compliance with the test procedures in Part I.C.4., of this Permit.

5. Reporting.

Monitoring results obtained during each six-month reporting period shall be submitted, in tabular form, and postmarked no later than the 28th day of the month after the end of the reporting period.

The first reporting period ends on July 1, 1989, and the first report is due on July 28, 1989, and each six months thereafter.

All reports shall be submitted to Pima County Wastewater Management Department at the following address:

Pima County Wastewater Management Department
Technical Services Section
800 West Congress Street
Tucson, Arizona 85745

6. Records Retention.

All records, books, correspondence, reports, and any and all information relating to monitoring, sampling, and chemical analysis made by or on behalf of the Permit holder in connection with its discharge shall be retained and preserved for no less than three years. All records, which pertain to matters which are subject to administrative action or any other enforcement or litigation activities brought by Pima County pursuant to Pima County Industrial Wastewater Ordinance or other applicable regulations, shall be retained and preserved by the discharger until all enforcement activities have concluded and all periods of limitation for appeals have expired.

PART II

A. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All discharges authorized herein shall be consistent with the terms and conditions of this Permit. The discharge of any pollutant identified in this Permit more frequently than or at a concentration in excess of that authorized shall constitute a violation of the Permit. Any anticipated facility expansions, production increases, or process modifications which will result in new, different, or increased discharges of pollutants must be reported by submission of a new Permit application or, if such changes will not violate the discharge limitations specified in this Permit, by notice to the Pima County Wastewater Management Department of such changes at the address specified in Part I.C.5. Following such notice, the Permit may be modified to specify and limit any pollutants not previously limited or change existing limits. Approval must be obtained prior to any new discharges. The Permit holder shall allow 150 days for review.

2. Noncompliance Notification.

If, for any reason, the Permit holder does not comply with or will be unable to comply with any discharge limitation specified in this Permit, the Permit holder shall provide the Director with the following information, in writing, within five days of becoming aware of such condition:

a. A description of the discharge and cause of noncompliance; and
b. The period of noncompliance including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue and the steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.

3. Facilities Operations.

The Permit holder shall at all times maintain in good working order and operation, all pretreatment or control facilities or systems installed or used by the Permit holder to achieve compliance with the terms and conditions of this Permit.

4. Adverse Impact.

The Permit holder shall take all reasonable steps to minimize any adverse impact to the Pima County sanitary sewerage system resulting from noncompliance with any effluent limitations specified in this Permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

5. Bypassing.

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this Permit is prohibited, except where the Permit holder determines that such diversion is necessary to prevent loss of life or severe property damage.

The Permit holder shall promptly notify the Director verbally and in writing of each such diversion or bypass so that the County's treatment plant may be protected. The telephone number to use is 792-8676 during normal working hours (8-5, M-F), or 888-4801 (Roger Road Water Pollution Control Facility) or 744-4236 (Ina Road Water Pollution Control Facility) at all other times. Documentation shall also be sent as specified in Part II.A.2.

6. Removed Substances.

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewater shall be disposed of in such a manner as to prevent their introduction to the Pima County sanitary sewerage system. Disposal of said pollutants shall also be in accordance with any pertinent Federal, State, or Local rules and regulations.

7. Power Failure.

In order to maintain compliance with effluent limitations and prohibitions of this Permit, the Permit holder shall:

Not applicable.

8. Spill Protection.

   a. The Permit holder shall be responsible for all accidental discharge protection and spill protection necessary to control the entry of materials into the sewerage system. This includes compliance with schedules or requirements in Part III of this Permit.

   b. No later than 14 days following each date identified in the above-referenced schedule of construction, the Permit holder shall submit a written report of progress and the probability of meeting the next scheduled requirement.

B. RESPONSIBILITIES

1. Right of Entry.

   The Permit holder shall allow the Director and/or his authorized representatives, upon the presentation of credentials:

   a. To enter upon the Permit holder's premises where a discharge source is located or in which any records are required to be kept under the terms and conditions of this Permit and in accordance with Pima County Industrial Wastewater Ordinance; and

   b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this Permit; to inspect any monitoring equipment or monitoring method required in this permit; to inspect any process generating or suspected of generating industrial wastes; and to sample any discharge.

2. Transfer of Ownership or Control.

   In the event of any change in control or ownership of facilities from which the authorized discharges occur, the Permit holder shall notify, by letter, the succeeding owner or controller of the existence of this Permit and the need to request Permit modification prior to the transfer. A copy of the letter shall be forwarded to the Director at the address designated in Part I.C.5., of this Permit.

3. Availability of Reports.

   Except for data determined to be confidential under Pima County Industrial Wastewater Ordinance, all reports prepared in accordance with the terms of this Permit shall be available for

public inspection at the Director's Office of the Pima County Wastevater Management Department. As required by the Clean Water Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of civil or criminal penalties as provided for in Pima County Industrial Wastevater Ordinance or Section 309 of the Federal Water Pollution Control Act.

4. Permit Modification.

   a. After notice and opportunity for a reply, this Permit may be modified in whole or in part during its term for cause including, but not limited to, the following:

      1. A change in any condition, either temporary or permanent that requires either reduction or elimination of a Permit requirement;

      2. Initiation or modification of the Federal Categorical Requirements for the discharge;

      3. Violation of any terms or conditions of this Permit;

      4. Obtaining this Permit by misrepresentation or failure to disclose fully all relevant facts; or

      5. Change in Permit conditions or requirements due to amendment of the Pima County Industrial Wastevater Ordinance.

   b. Notwithstanding Part II.B.4.a., if an effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established or modified under Section 307(a) of the Federal Water Pollution Control Act, the Pima County Industrial Wastevater Ordinance, or the Pima County Wastewater Management Directive No. DO-D-14 for a pollutant which is more stringent than any limitation for such pollutant in this Permit, this Permit shall be revised or modified in accordance with the effluent standard or prohibition and the Permit holder shall also be given at least 30 days notice.

5. Civil and Criminal Liability.

   a. Except as provided in Permit conditions on Bypassing (Part II.A.5.) and Power Failures (Part II.A.7.), nothing in this Permit shall be construed to relieve the Permit holder from civil or criminal penalties for noncompliance.

b. As a property owner, General Elecric Company
0001 River Rd
Schenectady NY 12345-6098
may also be liable for noncompliance of this Permit.

6. Liability Under Federal, State of Arizona, or Pima County Laws and Regulations.

Nothing in this Permit shall be construed to preclude the institution of any legal action or relieve the Permit holder from any responsibilities, liabilities, or penalties to which the Permit holder is or may be subject to under Pima County Industrial Wastewater Ordinance or any other applicable Federal, State, and Pima County laws or regulations.

7. Property Rights.

The issuance of this Permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.

8. Severability.

The provisions of this Permit are severable. If any provision of this Permit, or the application of any provision of this Permit, is held invalid to any circumstance, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby.

9. Reapplication.

If the Permit holder desires to continue to discharge after 12:01 a.m. on January 1, 1994, he shall reapply not later than 150 days prior to the noted date of expiration.

PART III

A. OTHER REQUIREMENTS

I.B.1. Compliance Schedule.

a. Within thrity (30) days from the effective date of this Permit, the Permit holder shall provide rainwater and rainwater runoff protection for the trench drain.

I.C.5.g.1. Reporting.

a. The Discharge Monitoring Report must also include the information gathered from each oil and sand interceptor cleaning.

II.A.8. Spill Protection.

a. Within thrity (30) days from the effective date of this Permit, the Permit holder shall provide spill protection for the trench drain.

PIMA COUNTY EMISSIONS INVENTORY FORM

PERMIT NUMBER 235 YEAR OF INVENTORY, 1997

NUMBER OF DAYS OPERATED PER YEAR 300 NUMBER OF SHIFTS PER DAY 2 NUMBER OF HOURS PER SHIFT 8 *EI FORM 02*

TYPE INDICATE MATERIAL TYPE AND HOW IT IS USED. E.G., PRINTING, THINNING, CLEANING, OTHER (PLEASE SPECIFY)	AMOUNT USED OF EACH MATERIAL USED, IN GALLONS OR POUNDS DURING THE YEAR INVENTORY	DENSITY OF MATERIALS IN POUNDS PER GALLON	%VOC OF EACH MATERIAL	MANUFACTURER/ BRAND NAME OF EACH SOLVENT PRODUCT	RECYCLED HOW MUCH SOLVENT PRODUCT WAS RECOVERED	DISPOSAL HOW MUCH PRODUCT DISPOSED OF
Paint - Yellow	22 Gal.	10	21.7%	Pioneer Paint Yellow #91-005	0	0
Paint - Cream	15 Gal.	10	21.7%	Pioneer Paint FS 23972 Desert Cream	0	0
Paint - Grey	68 Gal.	10	21.7%	Pioneer Paint #92-001	0	0
Thinner - 1500	715 Gal	7.1	100%	GE 1500 Thinner	0	0
Paint 1202	26 Gal.	10	41.3%	Glyptal #1202	0	0
Paint 1201	44 Gals	11	36.2%	Glyptal #1201	0	0
Paint 1209	25 Gal.	10	38.6%	Glyptal #1209	0	0

COMPANY NAME General Electric Co.

SITE ADDRESS 1401 E. Valencia Rd. Tucson, Az. 85706

DATE 3-16-98

RESPONSIBLE PERSON (PLEASE PRINT), Chris Pahlberg

SIGNATURE Chris Pahlberg

RETURN TO: PIMA COUNTY AIR QUALITY CONTROL DISTRICT
130 WEST CONGRESS ST.
TUCSON, ARIZONA 85701
PHONE: (602) 740-3328

Failure to provide complete and accurate information could result in permit revocation and prosecution by the Pima County Attorney (REF TITLE 17.24.060, 070 Reporting For Emissions Inventories)

PIMA COUNTY EMISSIONS INVENTORY FORM

PERMIT NUMBER 235 YEAR OF INVENTORY, 1997

NUMBER OF DAYS OPERATED PER YEAR 300 NUMBER OF SHIFTS PER DAY 2 NUMBER OF HOURS PER SHIFT 8 *SEE FORM 02*

TYPE INDICATE MATERIAL TYPE AND HOW IT IS USED. E.G., PAINTING, THINNING, CLEANING, OTHER (PLEASE SPECIFY)	AMOUNT USED OF EACH MATERIAL USED, IN GALLONS OR POUNDS DURING THE YEAR INVENTORY	DENSITY OF MATERIALS IN POUNDS PER GALLON	%VOC OF EACH MATERIAL	MANUFACTURER/ BRAND NAME OF EACH SOLVENT PRODUCT	RECYCLED HOW MUCH SOLVENT PRODUCT WAS RECOVERED	DISPOSAL HOW MUCH PRODUCT DISPOSED OF
Varnish (Spray can)	268 cans	6.2	85%	MF-10C1V Varnish	0	0
Blue Fluid	192 cans	6	95%	MFGBLF Blueing	0	0
Black Spray Paint	456 cans	6	83%	MF-30B Gloss Black	0	0
Paint	288 cans	6.4	81.75%	MF-30MG Medium Grey	0	0
Rust Preventative	144 cans	6.1	80%	00711 Rust Preventative	0	0
Red Insulating Varnish	1440 cans	6.2	58.3%	SPRAY-ON 601 Red	0	0
Varnish (Hardner)	9 Gals.	10	60.1%	Glyptal 74010	0	0

COMPANY NAME General Electric Co.

SITE ADDRESS 1401 E. Valencia Rd. Tucson, Az. 85706

DATE 3-16-98

RESPONSIBLE PERSON (PLEASE PRINT), Chris Dahlberg

SIGNATURE Chris Dahlberg

RETURN TO: PIMA COUNTY AIR QUALITY CONTROL DISTRICT
130 WEST CONGRESS ST.
TUCSON, ARIZONA 85701
PHONE: (602)740-3328

Failure to provide complete and accurate information could result in permit revocation and prosecution by the Pima County Attorney (REF TITLE 17.24.060, 070 Reporting For Emissions Inventories)

PIMA COUNTY EMISSIONS INVENTORY FORM

PERMIT NUMBER 235 YEAR OF INVENTORY, 1997

NUMBER OF DAYS OPERATED PER YEAR 300 NUMBER OF SHIFTS PER DAY 2 NUMBER OF HOURS PER SHIFT 8 *BI FORM 02Y

TYPE INDICATE MATERIAL TYPE AND HOW IT IS USED. E.G., PRINTING, THINNING, CLEANING, OTHER (PLEASE SPECIFY)	AMOUNT USED OF EACH MATERIAL USED, IN GALLONS OR POUNDS DURING THE YEAR INVENTORY	DENSITY OF MATERIALS IN POUNDS PER GALLON	NVOC OF EACH MATERIAL	MANUFACTURER/ BRAND NAME OF EACH SOLVENT PRODUCT	RECYCLED HOW MUCH SOLVENT PRODUCT WAS RECOVERED	DISPOSAL HOW MUCH PRODUCT DISPOSED OF
VPI Varnish #702	219 Gals	8.9	18%	#702	0	0
DIP TANK Varnish #712	67 Gals	10.4	15.4%	#712	0	0

COMPANY NAME General Electric Co.

SITE ADDRESS 1401 E. Valencia Rd. Tucson, Az. 85706

DATE 3-16-98

RESPONSIBLE PERSON (PLEASE PRINT), Chris Dahlberg

SIGNATURE Chris Dahlberg

RETURN TO: PIMA COUNTY AIR QUALITY CONTROL DISTRICT
130 WEST CONGRESS ST.
TUCSON, ARIZONA 85701
PHONE: (602) 740-3328

Failure to provide complete and accurate information could result in permit revocation and prosecution by the Pima County Attorney (REF TITLE 17.24.060, 070 Reporting For Emissions Inventories)

PIMA COUNTY EMISSIONS INVENTORY FORM

PERMIT NUMBER 235 YEAR OF INVENTORY, 1997

COMPLETE FOR ALL WASTE, PATHOLOGICAL AND CREMATORY INCINERATORS. *EI FORM 10*

TYPE OF INCINERATOR	NUMBER OF DAYS OPERATED	QUANTITY BURNED PER DAY (IN POUNDS)	TYPE OF AIR POLLUTION CONTROL DEVICE (IF APPLICABLE)
ARMATURE BURN OUT OVEN	55	11	N/A
STATOR BURN OUT OVEN	37	17	N/A

COMPANY NAME General Electric Co.

SITE ADDRESS 1401 E. Valencia Rd. Tucson, Az. 85706

DATE 3-16-98

RESPONSIBLE PERSON (PLEASE PRINT), Chris Dahlberg

SIGNATURE Chris Dahlberg

RETURN TO: PIMA COUNTY AIR QUALITY CONTROL DISTRICT
130 WEST CONGRESS ST.
TUCSON, ARIZONA 85701
PHONE: (602) 740-3395

Failure to provide complete and accurate information could result in permit revocation and prosecution by the Pima County Attorney (REF. TITLE 17, 17.24.060, 070, REPORTING FOR EMISSIONS INVENTORIES)

AIR POLLUTION PERMIT APPLICATION

TUCSON SERVICE CENTER

Prepared for

General Electric Company
1401 E. Valencia Rd.
Tucson, AZ 85706

TL Miller
2/1/96
Rev. 1

CONTENTS

INTRODUCTION

The General Electric Company performed an air quality assessment in December 1994 at the GE Tucson Service Center. The purpose of the assessment was to evaluate air quality compliance as it relates to the facility's operations. A Potential Emissions Screening Survey was developed by ERM Northeast and was used to calculate the actual emissions as well as the potential to emit for each source. This Screening Survey is referenced throughout this emissions summary to demonstrate the methodology that was used.

The facility repairs various heavy electrical and mechanical equipment (predominantly electric motors, and armatures). Air emission sources identified include a burnout oven, bake ovens, paint/spray booth, VPI tanks, and a bead blast unit. Two Safety Kleen solvent recovery stations are also in service at the facility, but are the responsibility of Safety Kleen.

This Standard Permit application provides a sources listing, an *actual* emissions estimate for each source and a *potential* emissions estimate for each source. The Air Pollutant Fact Sheet was designed to include all information requested by the Department on the Standard Permit Application Form (Emission Sources Table) and is included as Attachment A.

AIR QUALITY ASSESSMENT

The air quality assessment consisted of identifying potential emissions sources, interviewing facility employees with respect to the facility processes and material usage, and reviewing MSDSs to identify volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). When calculating potential emissions, worst case emissions were assumed for all sources, regardless of existing control technology. That is, no control efficiencies were factored into the calculations for the potential to emit - all emissions are assumed to be "uncontrolled".

AIR EMISSION SOURCES

The air emission sources at the site are located throughout the facility. A plot plan identifying the locations of air emission sources is provided as Attachment B. Several processes that emit or can potentially emit air pollutants as point source discharges were observed. The point source discharges include (1) burnout oven for removing old insulation/varnish from electrical parts, (2) paint/spray booth, (3) varnish dip tanks/VPI tanks and (4) sand-blast booth/cabinet. GE's emission estimates are based on the data collected, good engineering judgment, and information provided in the ERM Emission Screening Survey (December 1994). A complete listing of sources and annual emissions is provided in Attachment A.

There are two general types of emissions from processes at the facility: (1) VOC and HAP emissions from evaporative losses of paints and varnishes and (2) criteria pollutant emissions from the combustion of natural gas. These pollutants include ozone (as VOCs), nitrogen oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO2) and particulate matter having an aerodynamic diameter of less than 10 microns (PM10). For equipment that uses natural gas, emissions were estimated on the basis of the maximum firing rates of the burners and total annual hours of operation for each piece of equipment. For estimating the VOC emissions, the annual usage and potential to emit were estimated for each type of paint or varnish for each source. A summary of coatings and varnishes used at the facility are provided in Attachment C. Individual air emissions sources are described in the sections to follow.

Burn-out Oven

The service center operates two (2) burn-out ovens. The ovens are used for removing old insulation/varnish from electrical parts and for drying parts that have been steam cleaned or to which coatings have been applied. The ovens burns natural gas. For the purpose of this assessment, the VOCs associated with the varnish are assumed to be volatized during the coating process, and the VOCs removed by the burning process are considered insignificant. Hence, emissions generated from burnout ovens are related to natural gas combustion only.

The potential emissions for the burn out oven were calculated based on the internal capacity of the oven ($\geq$ 216 cubic feet) and the subsequent load rating ($\geq$ 4800 lb.). Calculations for the acetylene torch direct flame burnout operation were based on the oven size category $\leq$ 42 cubic feet (load rating $\leq$ 600 lb.). The total emissions for this source are based on the sum of the capacity of the oven and the torch.

The lb./hr emission rates are based on stack test data taken during the heat cleaning portion of the burn cycle by Bayco Industries of California. This information was published in their technical bulletin dated 10 April 1977.

The pollutants, potential emissions and actual emissions for this source are listed below:

Source	Pollutants	Potential Emission Rate (ton/year)	Estimated Actual Emission Rate (ton/year)
Burnout Oven (small)	PM-10	0.17	0.0010
	SO2	0.01	0.0001
	NOx	0.25	0.0083
	VOC	0.04	0.0017
	CO	0.12	0.0003

Equipment Description: (No Name plate - based on purchasing records)

GE ID: C43278
Make: Mace
Model: Unknown/Serial 136
Load Rating: < 600 lb.
Internal Volume: < 42 cu ft

Source	Pollutants	Potential Emission Rate (ton/year)	Estimated Actual Emission Rate (ton/year)
Burnout Oven (large)	PM-10	0.63	0.0012
	SO2	0.04	0.0001
	NOx	0.94	0.0104
	VOC	0.16	0.0022
	CO	0.46	0.0004

Equipment Description:

GE ID: C89660 (rebuild)
Make: Bayco
Model: BB 216/Serial BB-4055
Load Rating: > 4,800
Internal Volume: > 216 cu ft

Bake Ovens

There are five bake ovens at the Tucson Service Center. Two ovens are electric and the remaining three use natural gas as a fuel source. The natural gas fired ovens are used for either drying parts that have been washed or steam cleaned or for the curing of coatings which have been applied. The three natural gas fired ovens presently receive most of the parts to which varnish has been applied. Emissions from these sources consist of VOCs generated during curing operations and criteria pollutant emissions associated with the burning of natural gas. Because this equipment is used in repair and maintenance processes rather than in a production process, emissions estimates were based on the amount of paints, varnishes and natural gas estimated to have been used in each of the units on an annual basis. Only one natural gas burning oven is rated above the "significance levels" per 17.04.340. The remaining ovens have been inventoried, but are not presented in this assessment as they fall below the levels referenced above. These combustion sources are indicated on the plot plan included as Attachment B.

Emissions associated with natural gas combustion were estimated using the burner's rated maximum hourly capacity multiplied by the hours of use and emission factors found in Tables 1.4-1, 1.4-2 and 1.4-3 of AP-42 for Emission Factors for Typical Metal Coating Plants.

Equipment description:

Bake Oven #1
Make: Steelman Bake Oven
Model: 568GS Serial Number: 70105
Stack Height: 30 ft
Diameter: 8 inch
Max Temp: 500 F
Design rate: Total BTU/hr 1.5 10^6 BTUH

Source	Pollutants	Potential Emission Rate (ton/year)	Estimated Actual Emission Rate (ton/year)
Bake Oven (#1)	PM-10	0.01	Information not avail.
	SO2	5E-4	"
	NOx	0.08	"
	VOC	0.02	"
	CO	3E-3	"

Varnish Dip Tank

Note: Dip tank is covered at all times with no additional controls

Emissions from the dip tank are based on the total annual usage of varnish, the VOC content of varnish and the emissions associated with dipping operation as determined from Table 4.2.2.4-2 of AP-42 (Emission Factors for Typical Metal Coating Plants). The dip tank is used to coat parts with IMI 712 varnish. Per 17.16.400 (C)(2)(a) through (d) surface coating of miscellaneous metal parts may not emit VOC in excess in certain defined quantities. As outlined below, even the dip tank operations potential to emit does not exceed those limits.

PDEQ Form C (printing, painting and other solvent using operations) is enclosed for this source.

Equipment description

Make: No Name Plate
Stack Height: 30 ft
Diameter: 6 inch
Capacity: 1300 gal

Source	Pollutants	Potential Emission Rate (ton/year)	Estimated Actual Emission Rate (ton/year)
Dip Tank	VOC	1.638	0.0320

Vacuum Pressure Impregnation Tank

Note: VPI Tank is covered and has no controls - vented inside

The facility has one VPI tank that uses a specific varnish that is impregnated onto electrical parts. The amount of VOCs from the process was based on the total estimated amount of varnish used, multiplied by the VOC content of the varnish and the percentage of emissions resulting from the initial release of the volatile when the tank is opened. This percentage was obtained from Table 4.2.2.4-2 of AP-42. The VPI tank is used to coat parts with IMI 707 varnish, which requires IMI 776 reducer.

PDEQ Form C (printing, painting and other solvent using operations) is enclosed for this source.

Source	Pollutants	Potential Emission Rate (ton/year)	Estimated Actual Emission Rate (ton/year)
VPI Tank	VOC	6.1055	0.1360
	xylenes	0.0605	0.0605

Equipment description
VPI Tank (GE ID 11982)
Make: No Name Plate
Stack Height: N/A
Capacity: 450 gal

Bead Blast Operations

The service center operates a bead blast booth, where particulate generated during the process are evacuated from the area through an exhaust system and filtered. The filters on the system are changed monthly to maintain optimum performance of the unit. The filtration system is intended to suppress visible emissions. PM emissions were calculated by using emission factors for abrasive blasting, hours of operation and the quantity of abrasive sprayed. Approximately 10 pounds of abrasive are sprayed each day over a period of four hours. The sand reclamation system and dry filter system are assumed to provide a 99 percent control efficiency, as is typical for this type of equipment.

PDEQ Form G (abrasive blasting information form) is enclosed for this source.

Source	Pollutants	Potential Emission Rate (ton/year)	Estimated Actual Emission Rate (ton/year)
Bead Blaster (garnet sand)	PM-10	21.06	0.0002

Blast Booth data

Make: Cleaner Mfg. AZ
Model: Bead Blaster
Stack Height: NA - internal filter system

Paint Booth

The facility has one paint booth that is used for applying paints to various reconditioned parts. There is no set production schedule of parts to which coatings are applied. Hence, only general usage activity information is available. The paint booth emissions are related to the hours of operation, quantity of paint that is sprayed and the VOC and HAP content of the paint. To estimate potential VOC and HAP emissions, GE conservatively assumed that the worst case VOC and HAP content paint was applied in the booth, 8760 hours per year. The paint booth has a dry filer that reduces particulate emissions.

PDEQ Form K (Paint booth information form) and PDEQ form C have been enclosed for this source.

The pollutants, potential emissions and actual emissions for this source are listed below:

Source	Pollutants	Potential Emission Rate (ton/year)	Estimated Actual Emission Rate (ton/year)
Paint Booth	PM-10	22.4	0.44
	VOC	109.3	0.32
	Xylenes	66.5	0.20
	Toluene	29.9	0.09
	MEK	0.10	0.00

Paint Booth data/GE ID C45896

Make:	Fluid Aire Inc
Model:	F-15-12-25
Dimensions:	15' wide 11'-10" high 25' long
Flow rate:	36,100 CFM
Filter type:	dry - 60 paint arrester filter (20"x20"x1")
Stack diameter:	48"
Cross draft vel:	100 fpm

There are also fugitive emissions associated with painting at the facility (spot painting). Emissions are summarized below.

Source	Pollutants	Potential Emission Rate (ton/year)	Estimated Actual Emission Rate (ton/year)
Painting (fug)	PM-10	0.011	0.011
	VOC	0.85	0.85
	Xylenes	0.24	0.24
	Toluene	0.31	0.31

The potential emissions for this source exceeds the 10 tons/year threshold for HAPs (xylene, toluene) and criteria pollutants (VOC). This facility would therefore meet the definition of a Major Source under the Clean Air Amendments. It is GE's intent to operate as a Synthetic Minor source by limiting material usage of the paint booth, provided federally enforceable limits can be applied. This concept is discussed in detail in the section entitled "Synthetic Minor Source Status".

SYNTHETIC MINOR SOURCE STATUS

As out-lined in the preceding sections of this application, this facility exceeds the major source threshold due to one emission point - the paint spray booth. A summary for all emissions for the facility is listed below:

POTENTIAL TO EMIT SUMMARY TABLE

Pollutant	tons/year
Particulate	44.3
SO2	0.051
NOx	1.27
VOC	118.1
CO	0.60
Individual HAPs	
Xylenes	66.8
Toluene	30.2
MEK	0.1
TOTAL POTENTIAL HAPs	97.3

Monitoring and limiting the total quantity of the paints used at the source provides a feasible solution on the part of both General Electric and the Department and sets enforceable limits the emissions from the paint booth. The proposed method for monitoring and limiting the paint usage is out-lined below.

Paint Booth Limit Condition - Material Balance/Paint Usage

The paint booth is actually operated an average of five (5) hours per week. This average is consistent with the volume of work in the facility for the last three (3) years.

(1) The coatings utilized in this paint booth have been identified on PDEQ Form C and Attachment C.

(2) When calculating the potential emissions for this operation, the "worst case" coating data was utilized. If a new coating is to ever be introduced, it will be required to have a lower VOC or HAP content than the worst case coating so as to ensure the potential emissions will never exceed those calculated for this application.

(3) In order to capture the actual emissions, a mass balance approach will be utilized for each coating. This mass balance will be based on a beginning inventory for each coating, a review of purchases or invoices for each coating and finally an ending balance for each coating. This review will provide the exact quantity of each coating that has been used.

(4) This paint usage calculation will be performed once each month.

(5) Copies of the monthly roll-ups will be kept on file at the facility.

ATTACHMENT A

AIR POLLUTANT FACT SHEET

Source #	Source	Pollutants (list all constituents)	Actual Estimated Emission Rate (ton/year)	Potential Emission Rate (ton/year)	Control Equipment
1	Burnout Oven (small)	PM-10 SO2 NOx VOC CO	0.001 0.0001 0.0083 0.0017 0.0003	0.17 0.01 0.25 0.04 0.12	None
2	Burnout Oven (large)	PM-10 SO2 NOx VOC CO	0.0012 0.0001 0.0104 0.0022 0.0004	0.63 0.04 0.94 0.16 0.46	None
3	VPI	VOC Xylenes	0.1360 0.0605	6.1055 0.0605	None
4	Paint Booth	PM-10 VOC Xylenes toluene MEK	0.44 0.32 0.20 0.09 0.00	22.4 109.3 66.5 29.9 0.10	Dry filter
5	Dip Tank	VOC	0.0320	1.638	None
6	Bead Blaster	PM-10	0.0002	21.06	Filter
7	Bake Oven #1	PM-10 SO2 NO CO VOC	Information not available	0.01 5E-4 0.08 0.02 3E-3	None
8	Painting fug	PM-10 VOC Xylenes toluene	0.011 0.85 0.24 0.31	0.011 0.85 0.24 0.31	None

UTM coordinates are not required as the source will operate as a synthetic minor rather than a major source.

ATTACHMENT B

ATTACHMENT C

Volatile Organic Emissions from Raw Material Uasge
General Electric - Tucson Service Center

Product	Annual Usage	Units	Density (lbs/gal) (lbs/can)	Annual Quantity (lbs)	Constituent	Weight Percent	Annual Emissions (lbs/year)	Daily Emissions (lbs/day)
Varnish 702C	100	Gal/yr	8.84	884.0	Vinyl Toluene	20	176.80	0.48
					Dicumyl Peroxide	0.5	4.42	0.01
					Xylene	0.5	4.42	0.01
					N-Butyl Alcohol	0.5	4.42	0.01
Varnish 707A	100	Gal/yr	8.92	892.0	Vinyl Toluene	27.5	245.30	0.67
Varnish 712C	25	Gal/yr	8.50	212.5	Dicumyl Peroxide	5	10.63	0.03
					Hexmethoxymethylmelamine	5	10.63	0.03
					Diallyl Phthalate	45	95.63	0.26
Varnish Add. 776	30	Gal/yr	7.42	222.6	Vinyl Toluene	27.5	61.22	0.17
Glyptal	24	Gal/yr	9.92	238.1	Xylene	34.3	81.66	0.22
					Naptha	5.6	13.33	0.04
					Stoddard	0.2	0.48	0.00
GE Thinner #1500	275	Gal/yr	6.58	1809.5	Xylene	35	633.33	1.74
					Toluene	45	814.28	2.23
					Aromatic HCs	18.5	334.76	0.92
Alkyd Enamel - White	69	Gals/yr	9.95	686.6	sec. Butanol	7	48.06	0.13
					2-Butoxythanol	4.5	30.89	0.08
Alkyd Enamel - Yellow	33	Gals/yr	9.95	328.4	sec. Butanol	7	22.98	0.06
					2-Butoxythanol	4.5	14.78	0.04
Alkyd Enamel - Gray	51	Gals/yr	9.95	507.5	sec. Butanol	7	35.52	0.10
					2-Butoxythanol	4.5	22.84	0.06

Volatile Organic Emissions from Raw Material Uasge
General Electric - Tucson Service Center

Product	Annual Usage	Units	Density (lbs/gal) (lbs/can)	Annual Quantity (lbs)	Constituent	Weight Percent	Annual Emissions (lbs/year)	Daily Emissions (lbs/day)
Alkyd Enamel - Green	1.5	Gals/yr	9.95	14.9	sec. Butanol	7	1.04	0.00
					2-Butoxythanol	4.5	0.67	0.00
Aerosol No. 1013	50	Cans/yr	0.53	26.5	Chlorinated VOCs	64	16.96	0.05
					Isobutane	15	3.98	0.01
					Propane	15	3.98	0.01
Aerosol No. 1012	150	Cans/yr	0.53	79.5	Aromatic HCs	60	47.70	0.13
					Isobutane	15	11.93	0.03
					Propane	15	11.93	0.03
MF-68LF Blue Fluid	50	Cans/yr	0.75	37.5	Toluene	25	19.87	0.05
					Methyl Ethyl Ketone	2	1.59	0.00
					Xylene	2	1.59	0.00
					n-Butonal	2	1.59	0.00
					Methyl Isobutyl Ketone	2	1.59	0.00
					Acetone	40	31.80	0.09
					Ethyl-Ethoxypropionate	2	1.59	0.00
					Isobutane	10	7.95	0.02
					Propane	10	7.95	0.02
MF-30MG Med Gray	300	Cans/yr	0.94	282.0	Propane	15	42.30	0.12
					2-Methylpropane	15	42.30	0.12
					Toleune	20	56.40	0.15
					Xylene	10	28.20	0.08
					Acetone	20	56.40	0.15
					Ethyl-Ethoxypropionate	2	5.64	0.02

Volatile Organic Emissions from Raw Material Uasge
General Electric - Tucson Service Center

Product	Annual Usage	Units	Density (lbs/gal) (lbs/can)	Annual Quantity (lbs)	Constituent	Weight Percent	Annual Emissions (lbs/year)	Daily Emissions (lbs/day)
MF-10CIV Clear Varn	150	Cans/yr	0.69	103.5	Propane	10	10.35	0.03
					Isobutane	10	10.35	0.03
					Toleune	5	5.18	0.01
					Xylene	15	15.53	0.04
					Acetone	30	31.05	0.09
					Ethyl-Ethoxypropionate	5	5.18	0.01
Glyptal Spray Cans	300	Cans/yr	0.79	237.0	Xylene	13.7	32.47	0.09
					Naptha	2.2	5.21	0.01
					Stoddard	0.1	0.24	0.00
				435 lbs	Methyl Ethyl Ketone	25	59.25	0.16
					n-Butonal	2	4.74	0.01
					Acetone	18	42.66	0.12
					Propane	15	35.55	0.10
			TOTALS				3329.03	9.12

Notes:

Raw Material Usage Estimated by Mr. Dave Shannon of Tucson Service Center
Volatile Organic Compound Weight Percentages Taken from MSDS
GE Thinner Assumes Total Annual Plant Usage of 330 Gallon, With Recovery of 55 Gallons
Emissions noted as Chlorinated VOCs and Aromatic HCs Did Not Specify Specific Compounds

ATTACHMENT D

PLEASE FILL OUT THE FORMS INDICATED BELOW AND RETURN THEM TO THE PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY. IF YOU NEED HELP IN COMPLETING THE FORMS, PLEASE CALL OUR AIR QUALITY BUSINESS ASSISTANCE REPRESENTATIVES AT (520) 740-3340.

(✓) Standard Permit Application Form and Emission Source Table

( ) Standard Permit Application Form (front page only)

( ) Simplified Steps for Applying for an Air Quality Permit

( ) Form B (Petroleum Liquid Storage Vessels)

(✓) Form C (Printing, Painting, and Other Solvent Using Operations)

( ) Form D (Natural Gas Equipment)

( ) Form E (Steam or Pressurized Hot Water Cleaning Operations)

( ) Form F (Street Sweeper Information Form)

(✓) Form G (Abrasive Blasting Information Form)

( ) Form H (Supplemental Information for Roofing Kettles)

( ) Form I (Soil Vapor Extraction Systems and Air Pollution Control Devices)

( ) Form J (Dry Cleaner Information Form)

(✓) Form K (PDEQ Paint Booth Information Form)

( ) Form L (PDEQ Woodworking Information Form)

( ) Form M (Charcoal Broiling Information Form)

( ) Form N (PDEQ Kiln Information Form)

( ) Form O (Reserved for Future Use)

( ) Form P (Polyester Resin Operations)

( ) Other: _____

130 West Congress Street • Tucson, AZ 85701
Phone: (602) 740-3340

STANDARD PERMIT APPLICATION FORM

(As required by A.R.S. § 49-480, and Title 17 of the Pima County Code)

1. Permit to be issued to: (Business license name of organization that is to receive permit) General Electric Company
2. Mailing Address: 1401 East Valencia Rd.
   City: Tucson State: AZ ZIP: 85706
3. Plant Name (if different item #1 above): same
4. Name (or names) of Owner or Operator: General Electric Co Phone: 889-3346
5. Name of Owner's Agent: Lorin Hewitt Phone: 889-3346
6. Plant/Site Manager or Contact Person: Chris Dahlberg Phone: 889-3346
7. Proposed Equipment/Plant Location Address: various per attached / 1401 E. Valencia
   City: Tucson County: Pima ZIP: 85706
   Indian Reservation (if applicable): N/A
   Section/Township/Range, Latitude/Longitude, Elevation:
8. General Nature of Business: Motor Repair
   Standard Industrial Classification Code: 7699
9. Type of Organization:
   ☒ Corporation ☐ Individual Owner
   ☐ Partnership ☐ Government Entity (Government Facility Code:)
   ☐ Other
10. Permit Application Basis: ☐ New Source ☐ Revision ☒ Renewal of Existing Permit
    ☐ Portable Source ☐ General Permit (Check all that apply.)
    For renewal or modification, include existing permit number: 235
    Date of Commencement of Construction or Modification: N/A - Existing Source
    Is any of the equipment to be leased to another individual or entity? ☐ Yes ☒ No
11. Signature of Responsible Official of Organization: Tracy L. Miller
    Official Title of Signer: Manager, Environment Health and Safety
12. Typed or Printed Name of Signer: Tracy L. Miller
    Date: 1/24/96 Telephone Number: 510-436-9224

Printing, Painting, and Other Solvent Using Operations

Equipment or Area (1)	For Equipment: Make	For Equipment: Model/ Serial #	For Equipment: Maximum Rated Capacity	Material (2)	Maximum Use: Gallons Per Hour (3)	Maximum Use: Gallons Per Day (3)	Actual gallons per year (3)
3 VPI	GE tag #	unknown 11982	450 gal	707 varnish	—	2 gal	200 gal/yr
				+ varnish added intermittently to make up tank			
4 Paint Booth	Fluid Aire	F-15-12-25	N/A	varies paints, enamels per Attach. C	-	2 gal	600 gal/yr
5 Dip Tank	unknown (no plate)		1300 gal	712 varnish	-	2 gal	200 gal/yr

Executive Officer: [signature] Title: EHS Mgr Date: 2/19/96

(1) For example, printing press, spray gun, etc.

(2) For example, ink, enamel, latex, thinner, cleanup solvent, etc.

(3) Report ink usage in pounds.

ABRASIVE BLASTING INFORMATION FORM
(Copy this form as necessary)
(Use one form for each abrasive blasting unit)

Company: General Electric Co. Permit #: 235

Address: 1401 E. Valencia Suite #: —

Hours of Operation: 16 Hours/Day 5 Days/Week 250 Days/Year

ABRASIVE BLASTING UNIT: MAKE: Cleaner Mfg MODEL: N/A

SERIAL NUMBER: none UNIT ID #: none

CAPACITY OF ABRASIVE BLASTING POT: unknown POUNDS

INTERNAL DIAMETER OF ABRASIVE BLASTING NOZZLE: 3/8 INCHES

INTERNAL COMBUSTION ENGINE (GASOLINE) (DIESEL) FUELED: N/A

MODEL #: _____ SERIAL #: _____

CYLINDERS: _____ CYCLES:(2/4) _____

BRAKE HP: _____ MAXIMUM DELIVERY RATE OF ____ CFM AT ___ PSIG

FUEL CONSUMPTION RATE ____ GALLONS/HOUR ____ GALLONS/YEAR

TYPE OF ABRASIVE AGENT USED:

____	SAND	____	STEEL SHOT
____	GRIT	____	PLASTIC
____	ALUMINUM OXIDE	____	COPPER SLAG
✓	GLASS BEADS	____	NUTSHELLS
____	GARNET	____	OTHER

POUNDS OF ABRASIVE BLASTING AGENT USED IN ONE YEAR 2500 lbs

BLASTING METHOD: ✓ DRY (100 PERCENT OF TIME)
____ WET (____ PERCENT OF TIME)

AVERAGE DIMENSIONS OF BLASTED ITEMS: varies ____ W x ____ L x ____ H

ABRASIVE BLASTING ROOM USED? ____ YES ✓ NO
(IF YES, LIST THE EFFICIENCY OF THE AIR POLLUTION CONTROL DEVICE): _____ %

METHODS USED TO CONTROL DUST FROM UNCONFINED ABRASIVE BLASTING: Enclosed blast unit with filters

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete. I understand that falsification of this certification is subject to possible civil and/or criminal penalties.

PRINT NAME: Tracey Miller TITLE: EHS Mgr

SIGNATURE: Tracey Miller TELEPHONE: 510-436-9224

PDEQ PAINT BOOTH INFORMATION FORM

COMPANY: General Electric Company PERMIT # 235

I. METHOD(S) OF SURFACE COATING APPLICATION

A. Spray Gun? Yes ✓ (If yes, please complete the rest of this section)

No____ (If no, proceed to section B)

1. How many different paint spray operations do you have at your facility? 2 paint booth fugitives

a. Describe in the table below the nature of each operation (touch up, spot painting, priming, finishing, etc.) What do you paint? see attached narrative in air emission summary

b. Location Code: (to be used in the table below)

	Code	Description
✓	AA	Out of doors with no special enclosure
✓	BB	Indoors with no special enclosure
✓	CC	In a commercially designed spray booth
	DD	In a homemade spray booth or enclosure.

Applicant's Identification of each Spray Gun Operation	Type of Coating Operation (spot, touch up, prime, finish, etc.)	Type of Parts or Pieces Coated	Operation Location Code (from the codes listed above select the most appropriate code)
Hanson Gun	spot } 98%	motors,	CC
Binks Gun	touch up }	various reconditioned	BB (infrequently when part with not fit in booth
*	prime or } 2%	parts	
	finish }		AA (extremely infrequently when material handling is constrained

* infrequent

c. If spray booth(s) is/are used, list make, model number, and type of controls used to reduce overspray.

Spray Booth Type: (Commercial or Homemade)	For Commercial Designs		Type of overspray control (filters, baffle system, water curtain, etc)	Estimated % Overspray Control Efficiency
	Make	Model №		
Fluid Aire Inc.	Floor filter paint booth	F-15-12-25	filters	≥ 96

D229-01987

Fax Sheet

DAMES & MOORE

DAMES & MOORE GROUP COMPANY

1790 E. River Road
Suite E-300
Tucson, Arizona 85718
520 529-1141 Tel
520-529-2449 Fax

To	Company	Fax Number
Kate Stearns	GE	(518) 385-4074
Stuart Edwards	D&M	CIN

From Brian Andersen

Date February 23, 1999

Subject Analytical results from floor drain samples

No. of pages 13 **Including cover sheet** **Task/Job No.** 38149-007-0303

Here are the analytical results from the floor drain samples. The samples were analyzed at moderate to high dilutions due to high levels of dissolved and suspended particulate matter. The analytical methods did not detect TCE or degradation byproducts. The analytical results have been summarized in the attached table following this page.

Operator _____

Date/Time _____

Analytical Results

Floor Drain Samples, Tucson Aparatus Repair Facility

2 composite samples collected from 6 floor drains (3 drains per composite)

Sample ID	Location	EPA Method 8080* PCBs (µg/Kg)	Volatiles by EPA Method 8260B (µg/Kg)					Semi-Volatiles by EPA Method 8270
			Acetone	Ethylbenzene	MIBK	Toluene	Xylenes	
A	Front of Building	3,200	<10,000	3,200	45,000	3,200	28,000	Due to matrix effects and/or other factrors, the samples required a 200-fold dillution. All analytes were below their respective detection limits.
B	Back of Building	3,600	1,700	180	1,900	560	1,200	

* Arochlor 1254 only PCB analyte detected

Sample ID	Priority Pollutant Metals by EPA Methods 6010B & 7471A (mg/Kg)												
	Sb	As	Be	Cd	Cr	Cu	Pb	Hg	Ni	Se	Ag	Tl	Zn
A	<20	38	<50	42	590	25,000	880	1.03	5,100	<40	86	<5.0	2,500
B	<50	75	<20	44	420	34,000	8,900	5.26	3,900	<100	170	<50	2,300

Del Mar Analytical
3852 Birch Ave., Irvine, CA 92606 (714) 261-1022 FAX (714) 261-1228
1014 E. Cooley Dr., Suite A, Colton, CA 92324 (909) 370-4667 FAX (909) 370-1046
16577 Sherman Way, Suite C-11, Van Nuys, CA 91406 (818) 779-1844 FAX (818) 779-1843
2465 W. 12th St., Suite 1, Tempe, AZ 85281 (602) 968-8772 FAX (602) 968-3601

Dames & Moore
1790 E. River Rd., E-300
Tucson, AZ 85718-5876
Attention: Brain Andersen

Client Project ID: 38149-007-033

Sample Descript: Solid, 38149-007-033A
Lab Number: PIB00785

Sampled: Feb 10, 1999
Received: Feb 11, 1999
Extracted: Feb 13, 1999
Analyzed: Feb 18, 1999
Reported: Feb 19, 1999

VOLATILE ORGANICS by GC/MS (EPA 8260B)

Analyte	Reporting Limit µg/Kg (ppb)	Sample Result µg/Kg (ppb)	Analyte	Reporting Limit µg/Kg (ppb)	Sample Result µg/Kg (ppb)
Acetone	10,000	N.D.	1,3-Dichloropropane	2,000	N.D.
Benzene	2,000	N.D.	2,2-Dichloropropane	2,000	N.D.
Bromobenzene	5,000	N.D.	1,1-Dichloropropene	2,000	N.D.
Bromochloromethane	5,000	N.D.	cis-1,3-Dichloropropene	2,000	N.D.
Bromodichloromethane	2,000	N.D.	trans-1,3-Dichloropropene	2,000	N.D.
Bromoform	5,000	N.D.	**Ethylbenzene**	**2,000**	**3,200**
Bromomethane	5,000	N.D.	Hexachlorobutadiene	5,000	N.D.
2-Butanone (MEK)	10,000	N.D.	2-Hexanone	10,000	N.D.
n-Butylbenzene	5,000	N.D.	Iodomethane	2,000	N.D.
sec-Butylbenzene	5,000	N.D.	Isopropylbenzene	2,000	N.D.
tert-Butylbenzene	5,000	N.D.	p-Isopropyltoluene	2,000	N.D.
Carbon Disulfide	5,000	N.D.	Methylene chloride	10,000	N.D.
Carbon tetrachloride	5,000	N.D.	**4-Methyl-2-pentanone (MIBK)**	**5,000**	**45,000**
Chlorobenzene	2,000	N.D.	Methyl-tert-butyl ether (MTBE)	5,000	N.D.
Chloroethane	5,000	N.D.	Naphthalene	5,000	N.D.
2-Chloroethyl vinyl ether	5,000	N.D.	n-Propylbenzene	2,000	N.D.
Chloroform	2,000	N.D.	Styrene	2,000	N.D.
Chloromethane	5,000	N.D.	1,1,1,2-Tetrachloroethane	5,000	N.D.
2-Chlorotoluene	5,000	N.D.	1,1,2,2-Tetrachloroethane	2,000	N.D.
4-Chlorotoluene	5,000	N.D.	Tetrachloroethene	2,000	N.D.
Dibromochloromethane	2,000	N.D.	**Toluene**	**2,000**	**3,200**
1,2-Dibromo-3-chloropropane	5,000	N.D.	1,2,3-Trichlorobenzene	5,000	N.D.
1,2-Dibromoethane (EDB)	2,000	N.D.	1,2,4-Trichlorobenzene	5,000	N.D.
Dibromomethane	2,000	N.D.	1,1,1-Trichloroethane	2,000	N.D.
1,2-Dichlorobenzene	2,000	N.D.	1,1,2-Trichloroethane	2,000	N.D.
1,3-Dichlorobenzene	2,000	N.D.	Trichloroethene	2,000	N.D.
1,4-Dichlorobenzene	2,000	N.D.	Trichlorofluoromethane	5,000	N.D.
Dichlorodifluoromethane	5,000	N.D.	1,2,3-Trichloropropane	10,000	N.D.
1,1-Dichloroethane	2,000	N.D.	1,2,4-Trimethylbenzene	2,000	N.D.
1,2-Dichloroethane	2,000	N.D.	1,3,5-Trimethylbenzene	2,000	N.D.
1,1-Dichloroethene	5,000	N.D.	Vinyl acetate	5,000	N.D.
cis-1,2-Dichloroethene	2,000	N.D.	Vinyl chloride	5,000	N.D.
trans 1,2-Dichloroethene	2,000	N.D.	**Xylenes (Total)**	**6,000**	**28,000**
1,2-Dichloropropane	2,000	N.D.			

Analytes reported as N.D. were not present at or above the reporting limit. Due to matrix effects and/or other factors, the sample required dilution. Reporting limits for this sample have been raised by a factor of 20.

DEL MAR ANALYTICAL, PHOENIX (AZ0426)

R.R.

Robyn Rice
Project Manager

Surrogate Standard Recoveries (Accept. Limits):	
Dibromofluoromethane (80-120)	Diluted out
Toluene-d8 (81-117)	Diluted out
4-Bromofluorobenzene (74-121)	Diluted out

Del Mar Analytical
2852 Alton Ave. Irvine, CA 92606 (714) 261-1022 FAX (714) 261-1228
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16577 Schoenborn Way, Suite C, Van Nuys, CA 91406 (818) 779-1844 FAX (818) 779-1843
1465 W. 12th St. Suite 1, Tempe, AZ 85281 (602) 968-8272 FAX (602) 968-8274

Dames & Moore
1790 E. River Rd., E-300
Tucson, AZ 85718-5876
Attention: Brain Andersen

Client Project ID: 38149-007-033

Sample Descript: Solid, 38149-007-033B
Lab Number: PIB00786

Sampled: Feb 10, 1999
Received: Feb 11, 1999
Extracted: Feb 13, 1999
Analyzed: Feb 18, 1999
Reported: Feb 19, 1999

VOLATILE ORGANICS by GC/MS (EPA 8260B)

Analyte	Reporting Limit µg/Kg (ppb)	Sample Result µg/Kg (ppb)	Analyte	Reporting Limit µg/Kg (ppb)	Sample Result µg/Kg (ppb)
Acetone	**500**	**1,700**	1,3-Dichloropropane	100	N.D.
Benzene	100	N.D.	2,2-Dichloropropane	100	N.D.
Bromobenzene	250	N.D.	1,1-Dichloropropene	100	N.D.
Bromochloromethane	250	N.D.	cis-1,3-Dichloropropene	100	N.D.
Bromodichloromethane	100	N.D.	trans-1,3-Dichloropropene	100	N.D.
Bromoform	250	N.D.	**Ethylbenzene**	**100**	**180**
Bromomethane	250	N.D.	Hexachlorobutadiene	250	N.D.
2-Butanone (MEK)	500	N.D.	2-Hexanone	500	N.D.
n-Butylbenzene	250	N.D.	Iodomethane	100	N.D.
sec-Butylbenzene	250	N.D.	Isopropylbenzene	100	N.D.
tert-Butylbenzene	250	N.D.	p-Isopropyltoluene	100	N.D.
Carbon Disulfide	250	N.D.	Methylene chloride	500	N.D.
Carbon tetrachloride	250	N.D.	**4-Methyl-2-pentanone (MIBK)**	**250**	**1,900**
Chlorobenzene	100	N.D.	Methyl-tert-butyl ether (MTBE)	250	N.D.
Chloroethane	250	N.D.	Naphthalene	250	N.D.
2-Chloroethyl vinyl ether	250	N.D.	n-Propylbenzene	100	N.D.
Chloroform	100	N.D.	Styrene	100	N.D.
Chloromethane	250	N.D.	1,1,1,2-Tetrachloroethane	250	N.D.
2-Chlorotoluene	250	N.D.	1,1,2,2-Tetrachloroethane	100	N.D.
4-Chlorotoluene	250	N.D.	Tetrachloroethene	100	N.D.
Dibromochloromethane	100	N.D.	**Toluene**	**100**	**560**
1,2-Dibromo-3-chloropropane	250	N.D.	1,2,3-Trichlorobenzene	250	N.D.
1,2-Dibromoethane (EDB)	100	N.D.	1,2,4-Trichlorobenzene	250	N.D.
Dibromomethane	100	N.D.	1,1,1-Trichloroethane	100	N.D.
1,2-Dichlorobenzene	100	N.D.	1,1,2-Trichloroethane	100	N.D.
1,3-Dichlorobenzene	100	N.D.	Trichloroethene	100	N.D.
1,4-Dichlorobenzene	100	N.D.	Trichlorofluoromethane	250	N.D.
Dichlorodifluoromethane	250	N.D.	1,2,3-Trichloropropane	500	N.D.
1,1-Dichloroethane	100	N.D.	1,2,4-Trimethylbenzene	100	N.D.
1,2-Dichloroethane	100	N.D.	1,3,5-Trimethylbenzene	100	N.D.
1,1-Dichloroethene	250	N.D.	Vinyl acetate	250	N.D.
cis 1,2-Dichloroethene	100	N.D.	Vinyl chloride	250	N.D.
trans 1,2-Dichloroethene	100	N.D.	**Xylenes (Total)**	**300**	**1,200**
1,2-Dichloropropane	100	N.D.			

*Due to matrix effects, the surrogate recovery was outside of acceptance limits.
Analytes reported as N.D. were not present at or above the reporting limit.

DEL MAR ANALYTICAL, PHOENIX (AZ0426)

Surrogate Standard Recoveries (Accept. Limits):	
Dibromofluoromethane (80-120)	85%
Toluene-d8 (81-117)	69%*
4-Bromofluorobenzene (74-121)	67%*

Robyn Rice
Project Manager

Del Mar Analytical
2852 Alton Ave., Irvine, CA 92606 (714) 261-1022 Fax (714) 261-1228
1014 E. Cooley Dr., Suite A, Colton, CA 92324 (909) 370-4667 FAX (909) 370-1046
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3441 W. Elliot St., Suite 1, Tempe, AZ 85281 (602) 968-8772 FAX (602) 968-8901

Dames & Moore
1790 E. River Rd., E-300
Tucson, AZ 85718-5876
Attention: Brain Andersen

Client Project ID: 38149-007-033
Sample Descript: Solid, 38149-007-033A
Lab Number: PIB00785

Sampled: Feb 10, 1999
Received: Feb 11, 1999
Extracted: Feb 13, 1999
Analyzed: Feb 19, 1999
Reported: Feb 22, 1999

SEMI-VOLATILE ORGANICS by GC/MS (EPA 8270)

Analyte	Reporting Limit µg/Kg (ppb)	Sample Result µg/Kg (ppb)	Analyte	Reporting Limit µg/Kg (ppb)	Sample Result µg/Kg (ppb)
Acenaphthene	20,000	N.D.	Dimethyl phthalate	20,000	N.D.
Acenaphthylene	20,000	N.D.	4,6-Dinitro-2-methylphenol	50,000	N.D.
Aniline	30,000	N.D.	2,4-Dinitrophenol	50,000	N.D.
Anthracene	20,000	N.D.	2,4-Dinitrotoluene	20,000	N.D.
Azobenzene	30,000	N.D.	2,6-Dinitrotoluene	20,000	N.D.
Benzidine	200,000	N.D.	Di-N-octyl phthalate	100,000	N.D.
Benzoic Acid	100,000	N.D.	Fluoranthene	20,000	N.D.
Benz(a)anthracene	20,000	N.D.	Fluorene	20,000	N.D.
Benzo(b)fluoranthene	40,000	N.D.	Hexachlorobenzene	20,000	N.D.
Benzo(k)fluoranthene	40,000	N.D.	Hexachlorobutadiene	20,000	N.D.
Benzo(g,h,i)perylene	30,000	N.D.	Hexachlorocyclopentadiene	100,000	N.D.
Benzo(a)pyrene	30,000	N.D.	Hexachloroethane	40,000	N.D.
Benzyl alcohol	40,000	N.D.	Indeno(1,2,3-cd)pyrene	40,000	N.D.
Bis(2-chloroethoxy)methane	20,000	N.D.	Isophorone	20,000	N.D.
Bis(2-chloroethyl)ether	20,000	N.D.	2-Methylnaphthalene	20,000	N.D.
Bis(2-chloroisopropyl)ether	20,000	N.D.	2-Methylphenol	30,000	N.D.
Bis(2-ethylhexyl)phthalate	200,000	N.D.	4-Methylphenol	30,000	N.D.
4-Bromophenyl phenyl ether	30,000	N.D.	Naphthalene	30,000	N.D.
Butyl benzyl phthalate	100,000	N.D.	2-Nitroaniline	40,000	N.D.
4-Chloroaniline	20,000	N.D.	3-Nitroaniline	40,000	N.D.
2-Chloronaphthalene	20,000	N.D.	4-Nitroaniline	100,000	N.D.
4-Chloro-3-methylphenol	20,000	N.D.	Nitrobenzene	100,000	N.D.
2-Chlorophenol	50,000	N.D.	2-Nitrophenol	20,000	N.D.
4-Chlorophenyl phenyl ether	20,000	N.D.	4-Nitrophenol	100,000	N.D.
Chrysene	20,000	N.D.	N-Nitrosodiphenylamine	40,000	N.D.
Dibenz(a,h)anthracene	20,000	N.D.	N-Nitroso-di-N-propylamine	30,000	N.D.
Dibenzofuran	20,000	N.D.	Pentachlorophenol	100,000	N.D.
Di-N-butyl phthalate	50,000	N.D.	Phenanthrene	20,000	N.D.
1,3-Dichlorobenzene	20,000	N.D.	Phenol	30,000	N.D.
1,4-Dichlorobenzene	20,000	N.D.	Pyrene	30,000	N.D.
1,2-Dichlorobenzene	20,000	N.D.	1,2,4-Trichlorobenzene	20,000	N.D.
3,3-Dichlorobenzidine	100,000	N.D.	2,4,5-Trichlorophenol	30,000	N.D.
2,4-Dichlorophenol	20,000	N.D.	2,4,6-Trichlorophenol	30,000	N.D.
Diethyl phthalate	20,000	N.D.			
2,4-Dimethylphenol	50,000	N.D.			

Analysis completed at Del Mar Analytical-IRVINE (AZ0428)

Analytes reported as N.D. were not present at or above the reporting limit. Due to matrix effects and/or other factors, the sample required dilution. Reporting limits for this sample have been raised by a factor of 200.

Surrogate Standard Recoveries (Accept. Limits):	
2-Fluorophenol (25-121)	44%
Phenol-d6 (24-113)	49%
2,4,6-Tribromophenol (19-122)	47%
Nitrobenzene-d5 (23-120)	59%
2-Fluorobiphenyl (30-115)	72%
Terphenyl-d14 (18-137)	61%

DEL MAR ANALYTICAL, PHOENIX (AZ0426)

Robyn Rice
Project Manager

2842 Alton Ave. Irvine CA 92606 (714) 921-1022 FAX (714) 261-1228
(Address illegible) (909) 370-4667 FAX (909) 370-1046
16525 Sherman Way, Suite C-11, Van Nuys, CA 91406 (818) 779-1844 FAX (818) 779-1843
7365 W. 12th St., Suite 1, Tempe, AZ 85281 (602) 968-8272 FAX (602) 968-4401

Del Mar Analytical

Dames & Moore
1790 E. River Rd., E-300
Tucson, AZ 85718-5876
Attention: Brain Andersen

Client Project ID: 38149-007-033
Sample Descript: Solid, 38149-007-033B
Lab Number: PIB00786

Sampled: Feb 10, 1999
Received: Feb 11, 1999
Extracted: Feb 13, 1999
Analyzed: Feb 19, 1999
Reported: Feb 22, 1999

SEMI-VOLATILE ORGANICS by GC/MS (EPA 8270)

Analyte	Reporting Limit µg/Kg (ppb)	Sample Result µg/Kg (ppb)	Analyte	Reporting Limit µg/Kg (ppb)	Sample Result µg/Kg (ppb)
Acenaphthene	20,000	N.D.	Dimethyl phthalate	20,000	N.D
Acenaphthylene	20,000	N.D.	4,6-Dinitro-2 methylphenol	50,000	N.D
Aniline	30,000	N.D.	2,4-Dinitrophenol	50,000	N D
Anthracene	20,000	N D.	2,4-Dinitrotoluene	20,000	N D
Azobenzene	30,000	N D	2,6-Dinitrotoluene	20,000	N D
Benzidine	200,000	N.D.	Di-N-octyl phthalate	100,000	N.D.
Benzoic Acid	100,000	N.D.	Fluoranthene	20,000	N.D.
Benz(a)anthracene	20,000	N.D.	Fluorene	20,000	N.D.
Benzo(b)fluoranthene	40,000	N.D	Hexachlorobenzene	20,000	N D
Benzo(k)fluoranthene	40,000	N.D	Hexachlorobutadiene	20,000	N.D.
Benzo(g,h,i)perylene	30,000	N.D.	Hexachlorocyclopentadiene	100,000	N D.
Benzo(a)pyrene	30,000	N.D.	Hexachloroethane	40,000	N.D.
Benzyl alcohol	40,000	N.D.	Indeno(1,2,3-cd)pyrene	40,000	N.D.
Bis(2-chloroethoxy)methane	20,000	N D	Isophorone	20,000	N D
Bis(2-chloroethyl)ether	20,000	N.D	2-Methylnaphthalene	20,000	N D
Bis(2-chloroisopropyl)ether	20,000	N.D.	2-Methylphenol	30,000	N D
Bis(2-ethylhexyl)phthalate	200,000	N.D.	4-Methylphenol	30,000	N.D.
4-Bromophenyl phenyl ether	30,000	N.D.	Naphthalene	30,000	N.D.
Butyl benzyl phthalate	100,000	N.D	2-Nitroaniline	40,000	N D.
4-Chloroaniline	20,000	N.D.	3-Nitroaniline	40,000	N D
2-Chloronaphthalene	20,000	N.D	4-Nitroaniline	100,000	N D
4-Chloro-3-methylphenol	20,000	N.D	Nitrobenzene	100,000	N D
2-Chlorophenol	50,000	N.D.	2-Nitrophenol	20,000	N.D.
4-Chlorophenyl phenyl ether	20,000	N.D.	4-Nitrophenol	100,000	N.D.
Chrysene	20,000	N.D.	N-Nitrosodiphenylamine	40,000	N.D.
Dibenz(a,h)anthracene	20,000	N.D.	N-Nitroso-di-N-propylamine	30,000	N.D.
Dibenzofuran	20,000	N D	Pentachlorophenol	100,000	N D
Di-N-butyl phthalate	50,000	N.D.	Phenanthrene	20,000	N.D.
1,3-Dichlorobenzene	20,000	N.D.	Phenol	30,000	N.D.
1,4-Dichlorobenzene	20,000	N.D.	Pyrene	30,000	N D
1,2-Dichlorobenzene	20,000	N D.	1,2,4-Trichlorobenzene	20,000	N D
3,3-Dichlorobenzidine	100,000	N.D.	2,4,5-Trichlorophenol	30,000	N D
2,4-Dichlorophenol	20,000	N D.	2,4,6-Trichlorophenol	30,000	N D
Diethyl phthalate	20,000	N D.			
2,4-Dimethylphenol	50,000	N.D.			

Analysis completed at Del Mar Analytical-IRVINE (AZ0428)

Analytes reported as N.D. were not present at or above the reporting limit. Due to matrix effects and/or other factors, the sample required dilution. Reporting limits for this sample have been raised by a factor of 200.

Surrogate Standard Recoveries (Accept. Limits)	
2-Fluorophenol (25-121)	58%
Phenol-d6 (24-113)	82%
2,4,6-Tribromophenol (19-122)	47%
Nitrobenzene-d5 (23-120)	70%
2-Fluorobiphenyl (30-115)	78%
Terphenyl-d14 (18-137)	79%

DEL MAR ANALYTICAL, PHOENIX (AZ0426)

R.R.

Robyn Rice
Project Manager

Del Mar Analytical
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1014 E. Cooley Dr., Suite A, Colton CA 92324 (909) 370 4667 FAX (909) 370 1041
16535 Sherman Way, Suite C-11, Van Nuys CA 91406 (818) 779 1844 FAX (818) 779 1843
3465 W. 12th St., Suite 1, Tempe, AZ 85281 (602) 968 8272 FAX (602) 968 3501

Dames & Moore
1790 E. River Rd., E-300
Tucson, AZ 85718-5876
Attention: Brain Andersen

Client Project ID: 38149-007-033
Sample Descript: Solid, 38149-007-033A
Lab Number: PIB00785

Sampled: Feb 10, 1999
Received: Feb 11, 1999
Extracted: Feb 16, 1999
Analyzed: Feb 18, 1999
Reported: Feb 19, 1999

POLYCHLORINATED BIPHENYLS (EPA 3550/8082)

Analyte	Reporting Limit µg/Kg (ppb)	Sample Result µg/Kg (ppb)
Aroclor 1016	2,000	N.D.
Aroclor 1221	2,000	N.D.
Aroclor 1232	2,000	N.D.
Aroclor 1242	2,000	N.D.
Aroclor 1248	2,000	N.D.
Aroclor 1254	**2,000**	**3,200**
Aroclor 1260	2,000	N.D.

Analysis completed at Del Mar Analytical-IRVINE (AZ0428)

Analytes reported as N.D. were not present at or above the reporting limit. Due to matrix effects and/or other factors, the sample required dilution. Reporting limits for this sample have been raised by a factor of 40.

DEL MAR ANALYTICAL, PHOENIX (AZ0426)

R.R.

Robyn Rice
Project Manager

Surrogate Standard Recoveries (Accept Limits):	
Tetrachloro-m-xylene (30-130)...	Diluted out
Decachlorobiphenyl (30-130)	Diluted out

Del Mar Analytical
2852 Alton Ave. Irvine, CA 92606 (714) 261-1022 FAX (714) 261-1228
10151 Barkley Ave., Suite A, Fulton, CA 92324 (909) 370-4667 FAX (909) 370-1046
16525 Sherman Way Suite C-11, Van Nuys, CA 91406 (818) 779-1844 FAX (818) 779-1843
2465 W. 12th St., Suite 1, Tempe, AZ 85281 (602) 968-8272 FAX (602) 968-7011

Dames & Moore
1790 E. River Rd., E-300
Tucson, AZ 85718-5876
Attention: Brain Andersen

Client Project ID: 38149-007-033
Sample Descript: Solid, 38149-007-033B
Lab Number: PIB00786

Sampled: Feb 10, 1999
Received: Feb 11, 1999
Extracted Feb 16, 1999
Analyzed Feb 18, 1999
Reported Feb 19, 1999

POLYCHLORINATED BIPHENYLS (EPA 3550/8082)

Analyte	Reporting Limit µg/Kg (ppb)	Sample Result µg/Kg (ppb)
Aroclor 1016	2,000	N.D.
Aroclor 1221	2,000	N.D.
Aroclor 1232	2,000	N.D.
Aroclor 1242	2,000	N.D.
Aroclor 1248	2,000	N.D.
Aroclor 1254	2,000	3,600
Aroclor 1260	2,000	N.D.

Analysis completed at Del Mar Analytical-IRVINE (AZ0428)

Analytes reported as N.D. were not present at or above the reporting limit. Due to matrix effects and/or other factors, the sample required dilution. Reporting limits for this sample have been raised by a factor of 40.

DEL MAR ANALYTICAL, PHOENIX (AZ0428)

R.R.
Robyn Rice
Project Manager

Surrogate Standard Recoveries (Accept Limits)	
Tetrachloro-m-xylene (30-130)	Diluted out
Decachlorobiphenyl (30-130)	Diluted out

Del Mar Analytical
2852 Alton Ave., Irvine, CA 92606 (714) 261-1022 FAX (714) 261-1228
1014 E. Cooley Dr., Suite A, Colton, CA 92324 (909) 370-4667 FAX (909) 370-1046
16525 Sherman Way, Suite C-11, Van Nuys, CA 91406 (818) 779-1844 FAX (818) 779-1843
2465 W. 12th St., Suite 1, Tempe, AZ 85281 (602) 968-0272 FAX (602) 968-7031

Dames & Moore
1790 E River Rd., E-300
Tucson, AZ 85718-5878
Attention: Brain Andersen

Client Project ID: 38149-007-033

Sample Descript: Solid, 38149-007-033A
Lab Number: PIB00785

Sampled: Feb 10, 1999
Received: Feb 11, 1999
Extracted: Feb 12-14, 1999
Analyzed: Feb 13-19, 1999
Reported: Feb 19-22, 1999

E.P.A. PRIORITY POLLUTANT METALS

Analyte	EPA Method	Reporting Limit mg/Kg (ppm)	Sample Result mg/Kg (ppm)	Date Extracted	Date Analyzed
Antimony	6010B	20*	N.D.	02/12/99	02/19/99
Arsenic	6010B	20*	38	02/12/99	02/19/99
Beryllium	6010B	20*	N.D.	02/12/99	02/19/99
Cadmium	6010B	0.50	42	02/12/99	02/13/99
Chromium	6010B	2.0	590	02/12/99	02/13/99
Copper	6010B	10*	25,000	02/12/99	02/19/99
Lead	6010B	2.5	880	02/12/99	02/13/99
Mercury	7471A	0.020	1.03	02/14/99	02/14/99
Nickel	6010B	2.5	5,100	02/12/99	02/13/99
Selenium	6010B	40*	N.D.	02/12/99	02/19/99
Silver	6010B	10*	86	02/12/99	02/19/99
Thallium	6010B	5.0	N.D.	02/12/99	02/13/99
Zinc	6010B	2.5	2,500	02/12/99	02/13/99

*Analytes reported as N.D. were not present at or above the reporting limit. Due to matrix effects and/or other factors, the sample required dilution. Reporting limits for this sample have been raised.

DEL MAR ANALYTICAL, PHOENIX (AZ0426)

R.R.
Robyn Rice
Project Manager

Del Mar Analytical
2852 Alton Ave. Irvine, CA 92606 (714) 261-1022 FAX (714) 261-1228
1014 E. Cooley Dr., Suite A, Colton, CA 92324 (909) 370-4667 FAX (909) 370-1046
16520 Saticoy St., Suite C-11, Van Nuys, CA 91406 (818) 779-1844 FAX (818) 779-1843
2421 W. 205 St., Suite D, Torrance, CA 90501 (310) 618-8889 FAX (310) 618-8811

Dames & Moore
1790 E River Rd., E-300
Tucson, AZ 85718-5876
Attention: Brain Andersen

Client Project ID: 38149-007-033

Sample Descript: Solid, 38149-007-033B
Lab Number: PIB00788

Sampled: Feb 10, 1999
Received: Feb 11, 1999
Extracted: Feb 12-14, 1999
Analyzed: Feb 13-18, 1999
Reported: Feb 18-22, 1999

E.P.A. PRIORITY POLLUTANT METALS

Analyte	EPA Method	Reporting Limit mg/Kg (ppm)	Sample Result mg/Kg (ppm)	Date Extracted	Date Analyzed
Antimony	6010B	50*	N.D.	02/12/99	02/19/99
Arsenic	6010B	50*	75	02/12/99	02/19/99
Beryllium	6010B	50*	N.D.	02/12/99	02/19/99
Cadmium	6010B	0.50	44	02/12/99	02/13/99
Chromium	6010B	2.0	420	02/12/99	02/13/99
Copper	6010B	25*	34,000	02/12/99	02/19/99
Lead	6010B	2.5	8,900	02/12/99	02/13/99
Mercury	7471A	0.020	5.26	02/14/99	02/14/99
Nickel	6010B	2.5	3,900	02/12/99	02/13/99
Selenium	6010B	100*	N.D.	02/12/99	02/19/99
Silver	6010B	25*	170	02/12/99	02/19/99
Thallium	6010B	50*	N.D.	02/12/99	02/19/99
Zinc	6010B	2.5	2,300	02/12/99	02/13/99

*Analytes reported as N.D. were not present at or above the reporting limit. Due to matrix effects and/or other factors, the sample required dilution. Reporting limits for this sample have been raised.

DEL MAR ANALYTICAL, PHOENIX (AZ0426)

R.R.

Robyn Rice
Project Manager

Del Mar Analytical
2852 Alton Ave Irvine CA 92714 (714) 833-3125 FAX (714) 833-3123
1441 E Cooley Dr Suite A Colton CA 92324 (909) 370-4667 FAX (909) 370-4697
15535 Sherman Way Suite C-11 Van Nuys CA 91406 (818) 779-1844 FAX (818) 779-1843
2465 W 12th St Suite 1 Tempe AZ 85281 (602) 968-8272 FAX (602) 968-1338

CHAIN OF CUSTODY FORM

Client Name/Address:	Project/PO Number:	Analysis Required
Dames & Moore 1790 E River Rd Ste E-300 Tucson AZ 85718	38149-007-033	
Project Manager/Phone Number	**Sampler**	
Brian Warden 520 529 1141		

Sample Description	Sample Matrix	Container Type	# of Cont	Sampling Date/Time	Preservatives	6010/7000 Priority Pollut. Metals	8260/8240 VOC's	82 70 Semi-VOC	8080 PCB's	Special Instructions
38149-007-033A	Solids	8oz	1	2/10/99 @ 10:00	Raw	X	X	X	X	Both samples may contain Sharp metal filings etc.
38149-007-033B	Solids	8oz	1	2/10/99 @ 10:00	Raw	X	X	X	X	

Relinquished By	Date/Time	Received by	Date/Time	Turnaround Time: (check)	
	2/10/99 @ 12:00 PM			same day ____	72 hours ____
Relinquished By	Date/Time	Received by	Date/Time	24 hours ____	5 days X
				48 hours ____	normal ____
Relinquished By	Date/Time	Received in Lab by	Date/Time	Sample Integrity (Check)	
		Jaime Wood	2-11-99 10:00	intact X	on ice X

Note: Sample(s) will be disposed of after 30 days

US EPA Region IX

General Electric Power Systems Response to Request for Information Pursuant to the General Electric Tucson, Arizona Service Center located at 1401 E. Valencia Road Tucson, Arizona

1. The full name, address, and telephone number, position or positions held by and tenure of the individual(s) answering any of these questions on our behalf are:

Christopher Allen
Manager - Global Services
1 River Road, Bldg. 2 - 1
Schenectady, NY 12345
(518) 385-0623

Bryce MacDonald
Manager - Remedial Programs
1 River Road, Bldg. 43 - 2
Schenectady, NY 12345
(518) 385-4980

James A. Sevinsky
Counsel - Environment, Health & Safety
1 River Road, Bldg. 43 - 2
Schenectady, NY 12345
(518) 385-8080

Katherine McKenzie
Paralegal - Environment, Health & Safety
1 River Road, Bldg. 43 -2
Schenectady, NY 12345
(518) 385-5105

Christian Dahlberg
Financial Operations Leader
1401 E. Valencia Road
Tucson, AZ
(520) 889-3346

William Lucas
Environment, Health & Safety
1401 E. Valencia Road
Tucson, AZ
(520) 889-3346

Wayne Smith
GE Tucson Service Center
1401 E. Valencia Road
Tucson, AZ
(520) 889-3346

Warren Threlkeld
GE Tucson Service Center
1401 E. Valencia Road
Tucson, AZ
(520) 889-3346

William Ross
GE Tucson Service Center
1401 E. Valencia Road
Tucson, AZ
(520) 889-3346

David Lowrey
GE Tucson Service Center
1401 E. Valencia Road
Tucson, AZ
(520) 889-3346

Jerry Carrillo
GE Tucson Service Center
1401 E. Valencia Road
Tucson, AZ
(520) 889-3346

2. The dates during which General Electric owned and operated the facility are from 1971 to date. **See Vol. 7 at Tab: Facility Deeds** for Deeds identifying the original purchase in 1971 and the subsequent purchase of the property to the west dated 1975. The site was unoccupied prior to GE's ownership.

3. General Electric Company's response to this corporate affiliation and ownership inquiry include the submission of the Annual Report. Please review the attached report for pertinent information and if there is additional information you require, we will provided it to you. Please note that the property was purchased in two pieces; one in 1971, and the second in 1975. There is no knowledge of any prior operations on the property. **See Volume 7; Tab: Facility Deeds**.

4. Upon information and belief, General Electric Company has been the only owner of the property, since its purchase. We have owned the property since approximately 1971.

5. Upon information and belief, the facility has approximately 37K ft2 of manufacturing space in which we are engaged in the maintenance and repair of industrial and mining equipment. There are 34 current employees and there have been as many as 115 in the past. The shop has been in operation since 1972. No products manufactured at the facility. The service shop repairs mining equipment including AC and DC motors; mechanical equipment; electrical equipment; and transportation equipment.

Although most of this was explained during your tour of the facility on August 25, 1998, if you require detail of any specific process or processes, please let us know.

6. For each process described above; the chemicals used relate to cleaning and painting of the various equipment. **See Volumes 1 & 2 of Manifests** for chemicals used; **See Volumes 2 & 3** for vendors. **See Volume 1** detailing waste streams, volume generated and disposition of streams. **See Volumes 1 & 2** for a copy of the shop's MSDS book.

a. **See Volumes 5 and 6**. A copy of the MSDS book as been included for your reference. This information includes all materials such as cleaning agents, detergents and solvents, their brand names and their chemical compositions;

b. The processes are described above in answer to question number 5 and upon information and belief, include maintenance, repair and cleaning of equipment; and

c. Waste streams, volumes of wastes generated and disposition of each can be found in **Volume 1**; **Tabs: Manifest Waste Log; Safety Kleen Manifests; Waste Streams and Profiles; and Waste Stream Preparation Guides**.

7. A map of the facility has been included. **See Volume 7, Tab: Facility Map.** A more detailed map will be provided under separate cover.

c. a. - c. **See Volume 7, Tab: Facility Map.**

d. There is an oil water separator located at the front of the property along the parking lot edge. There is a hazardous waste containment area at the back of the building , and there are no known dumps, burn pits, or leach fields. Information concerning used oil disposal is detailed in the information provided to us by the employees. **See Volume 7; Tab Employee Responses**.

8. Upon information and belief, the facility expanded in 1974. The expansion included a northerly extension of the building nearly doubling the size of the operation. On or about 1995 a pole barn was erected and that area holds newly refurbished parts awaiting shipping and there has been a hazardous waste containment area added in approximately 1985, located at the back of the building. In or about 1975, we purchased the property adjoining the western side of our facility The rest of the facility, including cement and pavement, has remains generally unchanged.

9. Upon information and belief, all known copies of permits and permit applications under local, state or federal environmental laws and regulations, including any waste discharge permits, and analysis conducted on discharged water are included in **Volume 2; at Tab: Permits**.

10. Information concerning leaks, spills, etc., are contained in the following documents:

a. - e. Upon information and belief, all know releases and all known information are contained **in Volume 4, at Tab: Correspondence;** and **Tab: Waste Water Discharge Oil and Grease**; and **Volume 7; Tab: Responses from Shop Personnel**.

11. **See Volume 3; Tab: Contacts; and Volume 2; Tab: GE Communications**, for documents pertaining to emergency release notification and company contacts.

12. The individual employees, past and present, who exercised actual control or who held significant authority to control activities at the facility are:

Mr. Dave Shannon, M.S.O. from 1992 - 1995
Tucson Service Shop
1401 Valencia Road
Tucson, AZ

Denise Gasbarri-Smith, Customer Service 1979 - 1994

Tom Hawse, Center Manager 1984 -1994

Cliff James, Center Manager 1983 - 1987

Lorin Hewitt, Center Manager 1978 - 1983

Larry Fuller, Center Manager 1976 - 1978

James Lance, Center Manager 1969 - 1976

13. The individuals who assisted in the preparation of your response to this information request are:

James Sevinsky
GE Main Plant
1 River Road
Schenectady, NY

Bryce MacDonald
GE Main Plant
1 River Road
Schenectady, NY

Katherine McKenzie
GE Main Plant
1 River Road
Schenectady, NY

14. N/A.

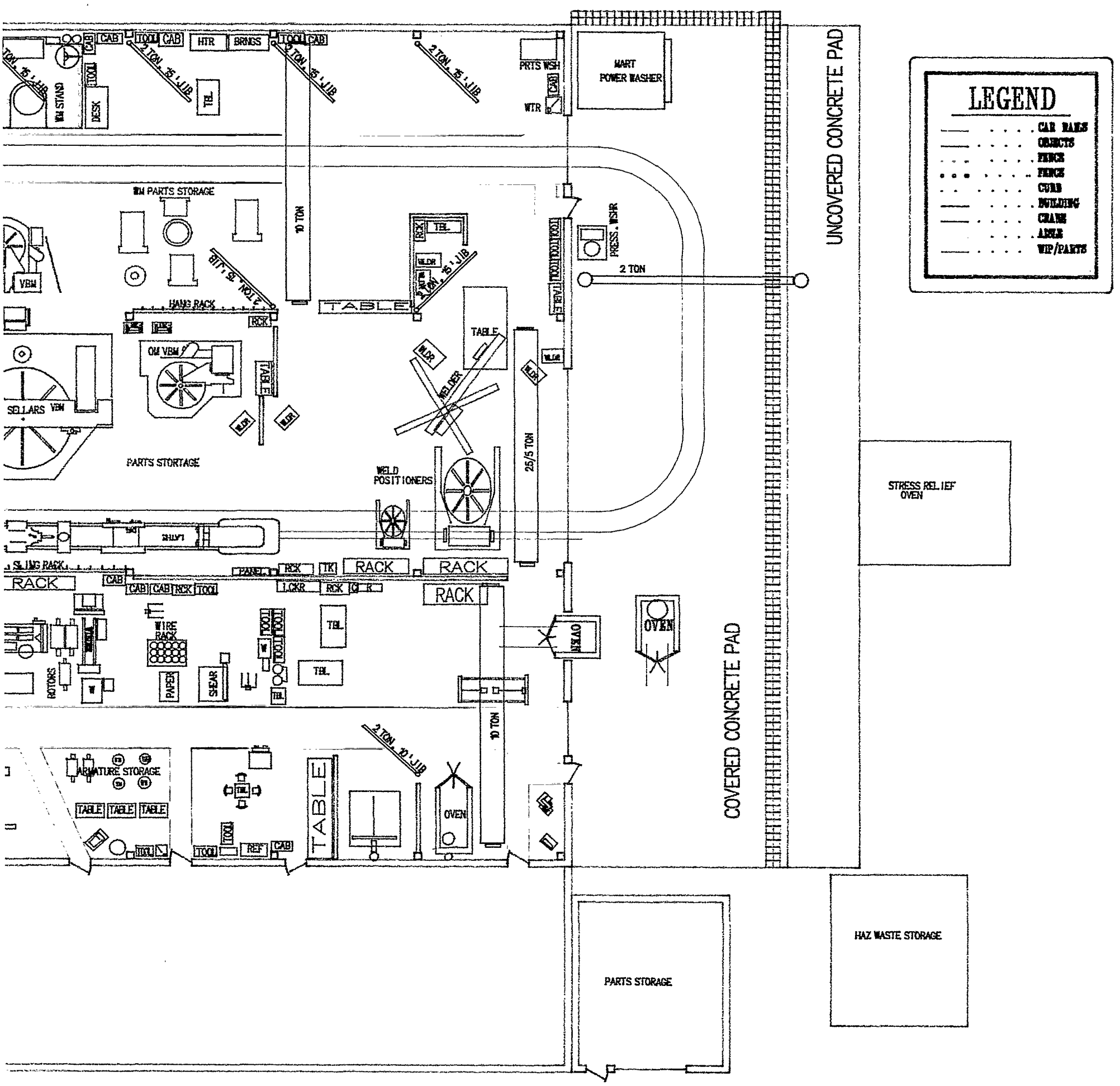
15. **See Volume 7; at Tab: Employee Responses** for attached List of shop employees to date.

16. See Attached 1997 Annual Report for the General Electric Company. Should you require any additional information not contained in this report please let us know.

A diligent search for records pertaining to the information requested has been performed. Should General Electric find any additional information pertaining to this request we will supplement this response immediately.

TUCSON SERVICE CENTER

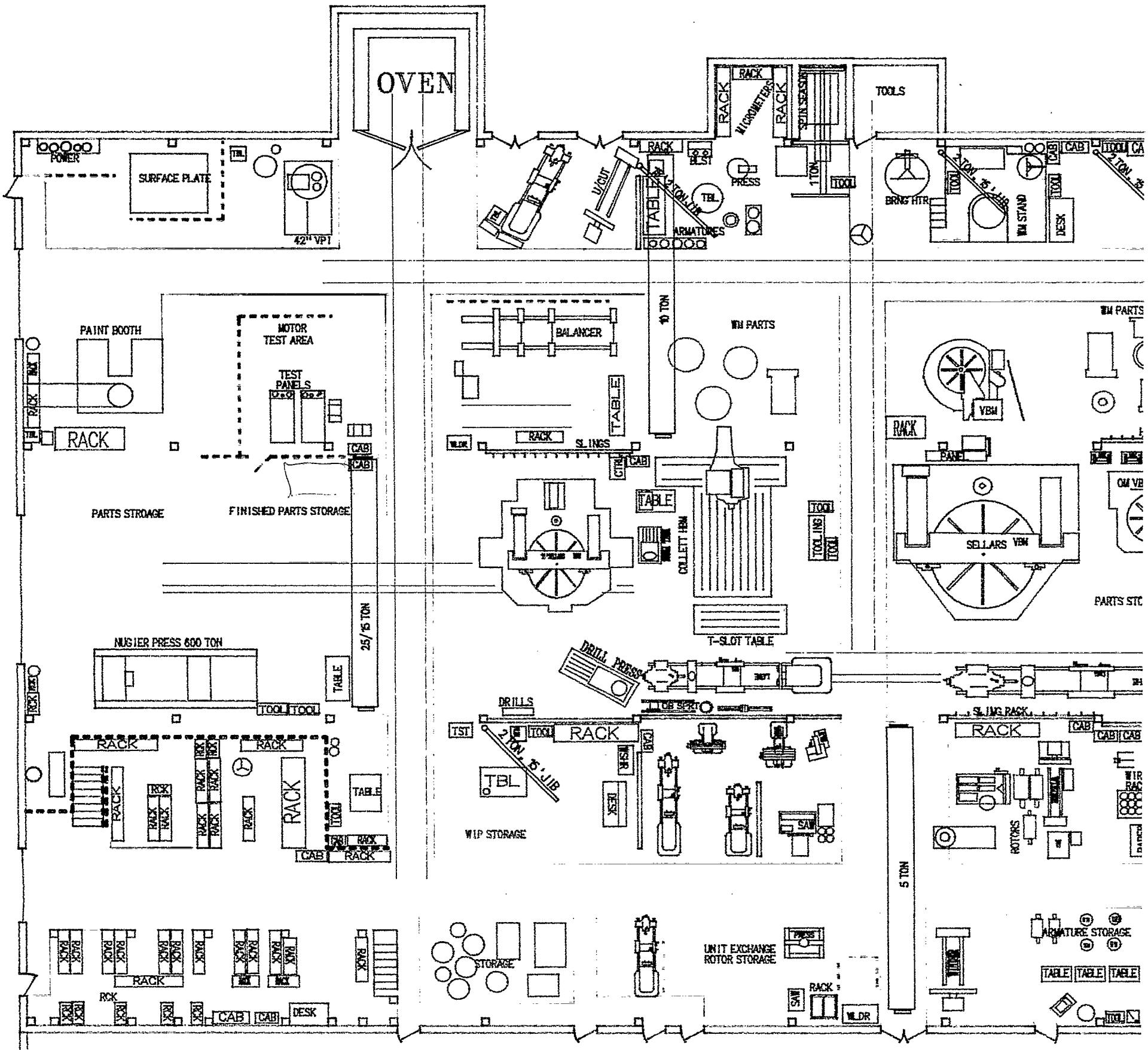
GE
1401 E. VALENCIA ROAD
TUCSON, AZ 85706-6098



15'

Dave Witsken 7/92

TU(



OFF ICES

SCALE : 1'' = 15 '

PARTIALLY SCANNED
OVERSIZE ITEM (S)

See Document # 143021
for partially scanned image(s).

For complete version of oversize document(s),
see paper copy.